

## 3.0 COMMENTS AND RESPONSES

### 3.1 COMMENTERS

This document contains public comments received on the DEIR, which consists of letters and emails received by the Placer County Community Development Resource Agency. Additionally, this document contains public comments and other materials (e.g., petitions, letters, exhibits, photographs, etc.) received at the July 22, 2010 Placer County Planning Commission Hearing. The following two sections list the commenters and the dates of the comments.

#### 3.1.1 Written Comment Letters Received

Comment Letter 1	Mark Morse, City of Roseville (July 22, 2010)
Comment Letter 2	James Navicky, California Department of Fish and Game (July 26, 2010)
Comment Letter 3	Scott Morgan, State Clearinghouse (July 27, 2010)
Comment Letter 4	John Clark (June 14, 2010)
Comment Letter 5	Vicki Bohlin (June 16, 2010 and July 15, 2010)
Comment Letter 6	Nancy Boris (June 16, 2010)
Comment Letter 7	Dave Forkum (June 16, 2010)
Comment Letter 8	Peter Azevedo (June 23, 2010)
Comment Letter 9	Robert & Linda Friend (June 23, 2010)
Comment Letter 10	Orlando Reyes (June 23, 2010)
Comment Letter 11	Sean Young (June 23, 2010)
Comment Letter 12	Raj D. (June 24, 2010)
Comment Letter 13	Helen Silveria (June 24, 2010)
Comment Letter 14	Sean Mitchell (July 3, 2010)
Comment Letter 15	Carol Flinn, Tim Sweeney, and Tamie Houser, Doyle Ranch Owner's Association (July 6, 2010, July 21, 2010, & July 23, 2010)
Comment Letter 16	Van Haas (July 8, 2010)
Comment Letter 17	Monica Alvarez (July 8, 2010)
Comment Letter 18	Shirley Alvarez (July 8, 2010)
Comment Letter 19	Teodoro Alvarez (July 8, 2010)
Comment Letter 20	Fred Arriaga (July 8, 2010)
Comment Letter 21	Angela Arriaga-Simpson (July 8, 2010)
Comment Letter 22	Joel Arriaga-Simpson (July 8, 2010)
Comment Letter 23	Gagandeep Bains (July 8, 2010)
Comment Letter 24	Parminder (PJ) Bajwa (July 8, 2010)
Comment Letter 25	Dion Brown (July 8, 2010)
Comment Letter 26	Yolanda Brown (July 8, 2010)
Comment Letter 27	Rachel Coles (July 8, 2010)
Comment Letter 28	Michael Coursey (July 8, 2010)
Comment Letter 29	Karen Coursey (July 8, 2010)
Comment Letter 30	Deborah Cousins (July 8, 2010)
Comment Letter 31	David Ekstrand (July 8, 2010)
Comment Letter 32	Margaret Ekstrand (July 8, 2010)
Comment Letter 33	Mimi Filizetti (July 8, 2010)
Comment Letter 34	Nancy Fowler (July 8, 2010)
Comment Letter 35	Lyuba Galushkin (July 8, 2010)
Comment Letter 36	Mikhail Galushkin (July 8, 2010)
Comment Letter 37	Teri Gonzalez (July 8, 2010)

Comment Letter 38	Lou Griffin (July 8, 2010)
Comment Letter 39	Gabrielle Haas (July 8, 2010)
Comment Letter 40	Van Haas (July 8, 2010)
Comment Letter 41	Tamie Houser (July 8, 2010)
Comment Letter 42	Debora Largent (July 8, 2010)
Comment Letter 43	Charles & Kelly Loseth (July 8, 2010)
Comment Letter 44	Mike McGrane (July 8, 2010)
Comment Letter 45	Adam McKahan (July 8, 2010)
Comment Letter 46	Karen McKahan (July 8, 2010)
Comment Letter 47	Deanna Mullen (July 8, 2010)
Comment Letter 48	Erin Mullen (July 8, 2010)
Comment Letter 49	Yakov Patlis (July 8, 2010)
Comment Letter 50	Yana Patlis (July 8, 2010)
Comment Letter 51	Brian Pointer (July 8, 2010)
Comment Letter 52	Galina Orlova (July 8, 2010)
Comment Letter 53	Tiffany Osgood (July 8, 2010)
Comment Letter 54	Gary Osgood (July 8, 2010)
Comment Letter 55	Gary Osgood (second submittal) (July 8, 2010)
Comment Letter 56	Leah Robinson (July 8, 2010)
Comment Letter 57	Jordan Robinson (July 8, 2010)
Comment Letter 58	Pippa Shibata (July 8, 2010)
Comment Letter 59	Tom & April Standring (July 8, 2010)
Comment Letter 60	Tim Sweeney (July 8, 2010)
Comment Letter 61	Name Illegible (July 8, 2010)
Comment Letter 62	Michelle Weigand (July 8, 2010)
Comment Letter 63	Tim Wong (July 8, 2010)
Comment Letter 64	Yun Zhang (July 8, 2010)
Comment Letter 65	Laura Ackerman (July 8, 2010)
Comment Letter 66	Monica Alvarez (July 8, 2010)
Comment Letter 67	Shirley Alvarez (July 8, 2010)
Comment Letter 68	Teodoro Alvarez (July 8, 2010)
Comment Letter 69	Blanca Arabi (July 8, 2010)
Comment Letter 70	Fred Arriaga (July 8, 2010)
Comment Letter 71	Joel Arriaga-Simpson (July 8, 2010)
Comment Letter 72	Angela Arriaga-Simpson (July 8, 2010)
Comment Letter 73	G.C. Anderson (July 8, 2010)
Comment Letter 74	Gagandeep Bains (July 8, 2010)
Comment Letter 75	Amar Bains (July 8, 2010)
Comment Letter 76	Aman Bains (July 8, 2010)
Comment Letter 77	Surinder Bains (July 8, 2010)
Comment Letter 78	Parminder (PJ) Bajwa (July 8, 2010)
Comment Letter 79	Rupinderjit Bains (July 8, 2010)
Comment Letter 80	David Bise (July 8, 2010)
Comment Letter 81	Teresa Bolden (July 8, 2010)
Comment Letter 82	Stephen Bridges (July 8, 2010)
Comment Letter 83	Becky Briggs (July 8, 2010)
Comment Letter 84	Rachel Coles (July 8, 2010)
Comment Letter 85	Michael Coursey (July 8, 2010)
Comment Letter 86	Tom Coursey (July 8, 2010)
Comment Letter 87	Stephen Coursey (July 8, 2010)
Comment Letter 88	Colleen Christiansen (July 8, 2010)

Comment Letter 89	Carol Flinn (July 8, 2010)
Comment Letter 90	William Fowler (July 8, 2010)
Comment Letter 91	Mikhail Galushkin (July 8, 2010)
Comment Letter 92	Lyuba Galushkin (July 8, 2010)
Comment Letter 93	Teri Gonzalez (July 8, 2010)
Comment Letter 94	Van Haas (July 8, 2010)
Comment Letter 95	Gabrielle Haas (July 8, 2010)
Comment Letter 96	Jim Hord (July 8, 2010)
Comment Letter 97	Zinna Howard (July 8, 2010)
Comment Letter 98	Galen James (July 8, 2010)
Comment Letter 99	Louise Lane (July 8, 2010)
Comment Letter 100	Debora Largent (July 8, 2010)
Comment Letter 101	Charles & Kelly Loseth (July 8, 2010)
Comment Letter 102	Jennie Luh (July 8, 2010)
Comment Letter 103	George Luh (July 8, 2010)
Comment Letter 104	Suneli Lyons (July 8, 2010)
Comment Letter 105	Tanya & Ananiy Malinovski (July 8, 2010)
Comment Letter 106	Jassie Mander (July 8, 2010)
Comment Letter 107	Mike McGrane (July 8, 2010)
Comment Letter 108	Deanna Mullen (July 8, 2010)
Comment Letter 109	Erin Mullen (July 8, 2010)
Comment Letter 110	Tiffany Osgood (July 8, 2010)
Comment Letter 111	Terrie Osgood (July 8, 2010)
Comment Letter 112	Terrie Osgood (second submittal) (July 8, 2010)
Comment Letter 113	Brian Pointer (July 8, 2010)
Comment Letter 114	Steve Prince (July 8, 2010)
Comment Letter 115	Debbie Prince (July 8, 2010)
Comment Letter 116	Leah Robinson (July 8, 2010)
Comment Letter 117	Jordan Robinson (July 8, 2010)
Comment Letter 118	Steve Rodgers (July 8, 2010)
Comment Letter 119	Conrad Santos (July 8, 2010)
Comment Letter 120	Pippi Shibata (July 8, 2010)
Comment Letter 121	Tom & April Standring (July 8, 2010)
Comment Letter 122	Daniel Strait (July 8, 2010)
Comment Letter 123	Tim Sweeney (July 8, 2010)
Comment Letter 124	Jonathan & Joyce Tobias (July 8, 2010)
Comment Letter 125	Jonathan Tobias (second submittal) (July 8, 2010)
Comment Letter 126	Michelle Weigand (July 8, 2010)
Comment Letter 127	Michael Wolfe (July 8, 2010)
Comment Letter 128	Autumn Wolfe (July 8, 2010)
Comment Letter 129	Yun Zhang (July 8, 2010)
Comment Letter 130	Mark Geyer & Jana Cervantes – Dry Creek Joint Elementary School District (July 12, 2010)
Comment Letter 131	Laura Ackerman (July 12, 2010)
Comment Letter 132	Jill Agee (July 12, 2010)
Comment Letter 133	Issa Arabi (July 12, 2010)
Comment Letter 134	Gagandeep Bains (July 12, 2010)
Comment Letter 135	Dion Brown (July 12, 2010)
Comment Letter 136	Yolanda Brown (July 12, 2010)
Comment Letter 137	Mahendra Dullabh (July 12, 2010)
Comment Letter 138	Hemlata Dullabh (July 12, 2010)

Comment Letter 139	Vimal Dullabh (July 12, 2010)
Comment Letter 140	Margaret Ekstrand (July 12, 2010)
Comment Letter 141	Mimi Filizetti (July 12, 2010)
Comment Letter 142	Carol Flinn (July 12, 2010)
Comment Letter 143	Tamie Houser (July 12, 2010)
Comment Letter 144	Ananiy & Tanya Malinovskiy (July 12, 2010)
Comment Letter 145	Ronnie Mander (July 12, 2010)
Comment Letter 146	Georgeta Marjean (July 12, 2010)
Comment Letter 147	Pete Marjean (July 12, 2010)
Comment Letter 148	Galina Orlova (July 12, 2010)
Comment Letter 149	Yakov Patlis (July 12, 2010)
Comment Letter 150	Yana Patlis (July 12, 2010)
Comment Letter 151	Ken Payne (July 12, 2010)
Comment Letter 152	Steve Prince (July 12, 2010)
Comment Letter 153	Debbie Prince (July 12, 2010)
Comment Letter 154	Gennadig Protasov (July 12, 2010)
Comment Letter 155	Olga Rodgers (July 12, 2010)
Comment Letter 156	Maria Santos (July 12, 2010)
Comment Letter 157	Dawn Strait (July 12, 2010)
Comment Letter 158	Tuan Tran (July 12, 2010)
Comment Letter 159	Autumn Wolfe (July 12, 2010)
Comment Letter 160	Tien Nguyen (July 13, 2010)
Comment Letter 161	Gene & Betty Huber (July 14, 2010)
Comment Letter 162	Bill Lobotzke (July 15, 2010 & July 22, 2010)
Comment Letter 163	Carol Flinn (July 16, 2010)
Comment Letter 164	William Fowler (July 16, 2010)
Comment Letter 165	Jani & Kati Estes, Debbie George, Monica Gollmyer (July 18, 2010)
Comment Letter 166	Aaron & Keri Johnson (July 19, 2010)
Comment Letter 167	Patsy Lobotzke (July 19, 2010 & July 22, 2010)
Comment Letter 168	Anthony & Rita Viviano (July 19, 2010)
Comment Letter 169	Kirk Viviano (July 19, 2010)
Comment Letter 170	George & Jo Ann Aiello (July 20, 2010)
Comment Letter 171	Michael & Autumn Wolfe (July 20, 2010)
Comment Letter 172	Norman Gifford (July 21, 2010)
Comment Letter 173	Kevin Poopalasingam (July 21, 2010)
Comment Letter 174	Jon & Lois Proko (July 21, 2010)
Comment Letter 175	Todd Shields (July 21, 2010)
Comment Letter 176	Pam Battaglia (July 22, 2010)
Comment Letter 177	Thomas & Celia Blalock (July 22, 2010)
Comment Letter 178	Jeff Devon – Morgan Creek Community Association (July 22, 2010)
Comment Letter 179	Lynda Phan (July 22, 2010)
Comment Letter 180	Chuck & Gloria Scott (July 22, 2010)
Comment Letter 181	Brigit Barnes – Brigit S. Barnes & Associates (July 23, 2010)
Comment Letter 182	Jasvinderjit (Jesse) Bhullar (July 23, 2010)
Comment Letter 183	Dave Cook – RCH Group (July 23, 2010)
Comment Letter 184	Tom Porter (July 23, 2010)
Comment Letter 185	Francisco & Belen Valencia (July 23, 2010)
Comment Letter 186	Shelly Werner (July 23, 2010)

### 3.1.2 Comments and Other Materials Received at July 22, 2010 Planning Commission Hearing on DEIR

Commenter 187	Tamie Houser (July 22, 2010)
Commenter 188	Jeff Devon (July 22, 2010)
Commenter 189	Maria Wong (July 22, 2010)
Commenter 190	Troy Burdick (July 22, 2010)
Commenter 191	Trisha Sweeny (July 22, 2010)
Commenter 192	Ken Payne (July 22, 2010)
Commenter 193	Adam McKahan (July 22, 2010)
Commenter 194	Bill Lobotzke (July 22, 2010)
Commenter 195	Aaron Johnson (July 22, 2010)
Commenter 196	Vicki Bohlin (July 22, 2010)
Commenter 197	Jeffrey Allen (July 22, 2010)
Commenter 198	Jana Cervantes (July 22, 2010)
Commenter 199	Candace Kost-Herbert (July 22, 2010)
Commenter 200	Russ Carollo (July 22, 2010)
Commenter 201	Troy Burdick (July 22, 2010)
Commenter 202	John Clark (July 22, 2010)
Commenter 203	Maria Wong (July 22, 2010)
Commenter 204	Ken Payne (July 22, 2010)
Commenter 205	Unknown Name (July 22, 2010)

## 3.2 MASTER RESPONSES

### MASTER RESPONSE 1 – OPPOSITION TO REMOVAL OF EXISTING TRAFFIC DIVERTER AT THE BASELINE ROAD/COOK-RIOLO ROAD/WOODCREED OAKS BOULEVARD INTERSECTION

Removal of the through-movement restriction (i.e., traffic diverter) at the Baseline Road/Cook-Riolo Road/Woodcreek Oaks intersection was discussed at several West Placer Municipal Advisory Committee (MAC) meetings between 2007 and 2010.

Several commenters expressed concern about the removal of the traffic diverter. The traffic diverter is currently having negative impacts for residents within the Roseville city limits, particularly along residential streets where “cut-through” traffic is created. The traffic diverter causes traffic to cut through Faulkner Drive and Caswell Drive within the Roseville city limits. According to studies performed by the City of Roseville, the traffic diverter creates the following traffic patterns:

- Over 50 percent of the traffic on Faulkner Drive and Caswell Drive is from vehicles whose owners reside outside the City of Roseville, and over 30 percent of the vehicles are from the Dry Creek Community and Antelope Road areas.
- Dry Creek School District buses use this route as cut-through.
- An average of 42 violations per day occur when vehicles illegally go around the traffic diverter, creating potential safety hazards.

**Table 6-9** on page 6-33 in the Draft EIR presents the forecasted daily traffic volume and level of service (LOS) calculations for the *Community Plan* area roadways under Alternative 1 (No Project Alternative) and the proposed project. As seen in **Table 6-9**, Cook-Riolo Road would experience a noticeable decline in traffic under the proposed project.

With the removal of the traffic diverter plus the addition of speed-reduction treatments along Cook-Riolo Road, the cumulative volumes are anticipated to decline under the proposed project. Similar traffic volume reductions are also forecasted for other *Community Plan* area roadways under the proposed project, such as Baseline Road and portions of Vineyard Road and PFE Road.

## **MASTER RESPONSE 2 – IMPACTS RELATED TO WIDENING OF WALERGA ROAD**

Since the *Dry Creek/West Placer Community Plan* was adopted in 1990, many land use changes have occurred in the *Community Plan* area, resulting in the need to update the *Community Plan – Transportation Element* to account for the effects of the proposed and approved developments in the *Community Plan* area and adjacent jurisdictions, and the associated traffic that is generated by them. The objective of the *Community Plan – Transportation Element* update is to improve traffic circulation within the *Community Plan* area while at the same time preserving its rural character. This objective was accomplished by amending the purpose, goals, and policies of the *Community Plan – Transportation Element*, and by focusing on specific roadway and intersection improvements at the program level (i.e., plan level).

The December 2007 Notice of Preparation/Initial Study (NOP/IS), included in the Draft EIR as **Appendix A**, analyzed the proposed project at a program level because it is not anticipated for construction until 20 years from now. The NOP/IS analyzed the proposed project at a program level because this is the appropriate level of analysis for a plan, and because project-specific details will be determined once the plan is approved and funding is available for development of specific plan components. The NOP/IS analyzed aesthetic, agricultural, air quality, biological, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/circulation, and utilities and service impacts of the proposed project to determine if any potentially significant impacts would occur. The NOP/IS determined that Air Quality, Noise, and Transportation and Circulation may have impacts that would be potentially significant and unavoidable, and that these resource areas should be carried forward to the Focused Draft EIR for analysis.

Subsequent to preparation of the NOP/IS, three new elements were added to the proposed project and separately evaluated as a part of the Draft EIR. The three new elements included widening of selected *Community Plan* area roadways (i.e., Watt Avenue, Walerga Road, and PFE Road) as described in **Section 2.2.2** on page 2-5 in the Draft EIR. The proposed project is limited to enhancing the existing roadway system in the *Community Plan* area. As explained in **Section 3.5.2**, which starts on page 3-14 in the Draft EIR, the majority of permanent ground disturbance associated with the proposed project would occur in previously disturbed areas, with the temporarily disturbed areas returned to pre-project conditions after construction is complete.

No new roadways are proposed. Because of this and because the scale of impact is located immediately adjacent to existing roadways, environmental impacts associated with the proposed project would be similar to those described in the NOP/IS, as described in the second paragraph of page 1-2 of the Draft EIR, except for Air Quality, Noise, and Transportation and Circulation.

## **Alternatives to the Proposed Project**

As explained in **Section 7.1.1** on page 7-1 of the Draft EIR, Placer County worked to identify alternatives within the *Community Plan* area that would avoid or substantially lessen significant future traffic impacts. Some alternatives that were initially considered were rejected because they could not meet one or more of the proposed project objectives. **Section 7.1.2** on page 7-2 of the Draft EIR describes in detail the

alternatives that were selected for detailed analyses in the Draft EIR. A total of five alternatives were evaluated and compared to the proposed project.

### **Traffic Modeling Related to Widening Walerga Road from Four Lanes to Six Lanes**

As a part of the Draft EIR, a traffic study was prepared to document existing and forecast traffic conditions in the *Dry Creek/West Placer Community Plan* area. A copy of the *Dry Creek West Placer Community Plan: Transportation Element Update Traffic Study* (January 28, 2009) and subsequent *Alternative 5 Results for the Dry Creek/West Placer Community Plan – Transportation Element Update* (June 22, 2009) prepared by Fehr & Peers Transportation Consultants are available for review at the Placer County Planning Department.

**Table 6-2** on page 6-8 of the Draft EIR and **Table 6-4** on page 6-11 of the Draft EIR show the existing traffic conditions (i.e., roadways and intersections, respectively). Forecast cumulative traffic conditions in the *Community Plan* area are based on Regional and *Community Plan* area land use assumptions (please see **Tables 6-5** and **6-6** on pages 6-24 and 6-25 of the Draft EIR) as well as the Regional and *Community Plan* area roadway assumptions (please see **Tables 6-7** and **6-8** on pages 6-27 and 6-29 of the Draft EIR). The traffic study determined where congestion would occur within the *Community Plan* area if no other roadway improvements were completed. As seen in **Tables 6-9** and **6-11** on pages 6-33 and 6-37 of the Draft EIR, traffic congestion would increase with or without the proposed project.

### **Potential Configuration of Six Lanes on Walerga Road**

The potential configuration of Walerga Road with six lanes will be as follows: six 11-foot lanes (Walerga Road currently has 12-foot lanes), two 5-foot bike lanes, and a reduced-width center landscaped median (from 11 feet at the Doyle Ranch/Morgan Creek subdivision entrance to 18 feet along straight-aways). The Doyle Ranch/Morgan Creek entrances will continue to have dedicated left-turn lanes. The dedicated right-turn lanes/merge lanes may need to be combined into shared through lanes/right-turn lanes/merge lanes. Since the total width from curb return to curb return is approximately 120 feet, a reduction of bike lane widths to 4 feet and additional narrowing of the center median could accomplish the installation of dedicated right-turn lanes.

With this configuration, it is not anticipated that Placer County will have to relocate the meandering sidewalk on the east side of Walerga Road or remove existing oak trees on the west side of Walerga Road. A small strip of ornamental landscaping may need to be removed between the curb and meandering sidewalk on the east side of Walerga Road. The low-rise earthen berm on the east side of Walerga Road will not need to be modified to accommodate the proposed project. However, it is anticipated that the drip lines of trees on the west side of Walerga Road could be impacted, although it is difficult to pinpoint the total number of trees at the program level. Detailed design of the plan components, at a later date, would include an assessment of which specific ornamental landscaping and trees would be impacted, if any.

### **Landscaping and Tree Removal**

Several commenters suggest the Draft EIR dismissively refers to the edges of the existing roadways as weedy patches even though they support urban landscaping and native vegetation. Additionally, several commenters suggest the Draft EIR states that little or no landscaping within the *Community Plan* area would be affected by the proposed project. Placer County disagrees with both suggestions. While roadway landscaping does exist within the *Community Plan* area, it is certainly not predominant along all roadways. Ornamental landscaping exists only at a few locations within the *Community Plan* area, primarily at the entrances of residential subdivisions. As stated on page 3-10 of the Draft EIR “The

project site(s) consist primarily of disturbed road shoulders dominated by weedy plant species. In areas off the immediate roadway shoulder but within the area of proposed disturbance, vegetation consists primarily of ornamental plants, as well as low-growing annual grasses and weeds associated with a few heavily grazed horse pastures and plowed fields.”

The Draft EIR analyzed the proposed project at a program level because this is the appropriate level of analysis for a plan, and because project-specific details will be determined once the plan is approved and funding is available for development of specific plan components. At this time, it is not feasible to estimate the amount of landscaping and/or trees that would need to be removed to accommodate the proposed widening of Walerga Road. Placer County disagrees with the suggestion that sufficient information exists that would allow for a quantifiable assessment of these impacts to be conducted prior to adoption of the Final EIR.

Depending on the conditions in effect in the future, the widening Walerga Road to six lanes could be accomplished by using a variety of methods: (1) removal of a small portion of the center concrete median and convert it to additional pavement; (2) narrowing the existing lane widths from 12 feet to 11 feet; (3) removal of landscaping between the curb and the meandering concrete sidewalk on the east side of Walerga Road; and/or (4) removal of a portion of the grassy area on the west side of Walerga Road. All methods will be considered and evaluated in the future, after the *Community Plan* update has been approved and once funding is available for development of specific plan components. Based on today’s conditions, it appears that no oak trees or the meandering sidewalks would be affected along Walerga Road. A retaining wall may need to be constructed to keep the meandering sidewalk in place. Additionally, the “greeter’s house” in the Morgan Creek subdivision would not be affected as it set far enough away from Walerga Road.

## **Roadway Widening Effects on the Rural Nature of the Community Plan Area**

The widening of Walerga Road from four to six lanes along the currently developed subdivisions appears to be possible without substantial change to the existing landscaping or setbacks. Over the upcoming years as projects within the *Community Plan* area, the City of Roseville, and Sacramento County continue to develop, the character of the area will change from open spaces, narrow roads, and grassy fields to a more suburban landscape with subdivisions and commercial development. The County is attempting to retain a portion of the “rural” feel of the *Community Plan* area by requiring new developments to maintain substantial setbacks from County roads, requiring meandering sidewalks, using native landscaping, and avoiding the use of sound walls.

## **MASTER RESPONSE 3 – WIDENING OF WALERGA ROAD BRIDGE OVER DRY CREEK**

As noted by several commenters, the Walerga Road Bridge Replacement Project was not analyzed within the Draft EIR. Placer County also notes that these comments relate to an issue that does not pertain to the adequacy of the Draft EIR. The Walerga Road Bridge Replacement Project was analyzed under a separate environmental document, as it is a separate project. A Mitigated Negative Declaration (MND), a copy of which is on file at the Department of Public Works, was prepared and received by the State Clearing House on January 23, 2009 (Refer to State Clearing House # 2008102100). This MND and its accompanying Initial Study analyzed the impacts of the construction of this bridge. This MND was approved by the Placer County Board of Supervisors on January 13, 2009.

## **Effects of Four-Lane Bridge on Proposed Widening of Walerga Road to Six Lanes**

On page 3, in the section entitled, **The Bridge and Approaches**, in the Initial Study supporting the MND, the bridge deck is described as being 100.5 feet wide, adequate for four 12-foot lanes, one 4-foot-wide



shoulder/bike lane, and one 20-foot center median. The bridge will also have a 12-foot-wide Class 1 Bikeway and an 8-foot-wide walkway separated from traffic with concrete barriers.

Based on the 100.5-foot-wide bridge deck, the Placer County would not need to widen the bridge in the future in order to accommodate six lanes on Walerga Road. Six lanes can be accommodated through the process of removal of the 20-foot center median and restriping lanes to have six 11-foot lanes. The shoulder/bike lane, the Class 1 Bikeway, and the 8-foot walkway will not be removed. Two typical sections are included at the end of this Master Response: one that shows a four-lane bridge with a 20-foot center median and one that shows a six-lane bridge. The bridge will be designed to handle six lanes of traffic from a structural standpoint.

## **Flooding Concerns**

The 100-year flood flow in Dry Creek overtops the existing bridge and inundates the roadway, causing road closures. The new bridge will be approximately 8 feet higher than the existing bridge. The new bridge will be raised vertically to elevate it out of the 100-year flood elevation, keeping the roadway clear of flooding. Page 7 of the Initial Study supporting the MND indicates, “the new 4 lane bridge will be wider and significantly longer than the existing bridge. The new bridge will be approximately 8 to 10 feet above the natural surface (original ground) and increasing to approximately 18 feet of clearance over Dry Creek.” “In addition, maintaining the clearance under the new bridge will also allow flood flow that overtops the bank of Dry Creek to pass under the bridge.”

## **Safety**

The new bridge will include lighting. Lighting will be installed along the bridge in order to enhance safety.

## **Traffic Impacts During Construction**

On page 3 of the Initial Study supporting the MND, the construction of the bridge is described as follows: “The new bridge will be constructed in two stages in order to maintain two lanes of traffic along Walerga Road. Stage 1 construction will consist of construction of the eastern portion of the bridge. Stage 2 construction consists of routing traffic onto Stage 1, removal of the existing bridge and construction of the western portion of the bridge.” It is the intent of the Placer County to keep traffic flowing, because this section of Walerga Road currently carries almost 15,000 vehicles per day. Since the existing bridge is currently a two-lane bridge, keeping two lanes open at all times will mitigate the construction impacts pertaining to traffic flow.

## **Biological Resources**

Pages 15 through 24 of the Initial Study supporting the MND analyzed the biological resource impacts of the proposed Walerga Road Bridge. Pages 16 through 22 of the Initial Study analyze the special-status species impacts of the proposed Walerga Road Bridge, while pages 23 and 24 outlined the proposed mitigation to reduce potentially significant impacts to a less-than-significant level. Impacts related to riparian habitat and tree loss are specifically discussed on pages 16 and 20. Impacts to Central Valley steelhead and Central Valley fall run Chinook salmon are specifically discussed on page 20. Impacts regarding alteration of the stream channel or streambed in Dry Creek are specifically discussed on pages 21 and 22. All impacts were mitigated to a less-than-significant level.

## Water Quality

Pages 11 through 13 of the Initial Study supporting the MND analyzed the water quality impacts of the proposed Walerga Road Bridge. Pages 12 and 13 outlined the proposed mitigation to reduce potentially significant impacts to a less-than-significant level. All impacts were mitigated to a less-than-significant level.

## MASTER RESPONSE 4 – TRANSPORTATION ELEMENT POLICY 6

Pertaining to *Community Plan – Transportation Element* Policy 6, the determination that elements such as landscaping and sidewalks must be installed as part of the frontage improvements for a development area and will always be a part of the Planning Department and Facility Services requirements. The intent of this policy change is to clarify that landscaping and sidewalks may be conditioned to be outside of County Right-of-Way, so that the Department of Public Works shall not be responsible for the maintenance of these facilities, but maintenance shall be the responsibility of individual Homeowner's Associations.

## MASTER RESPONSE 5 – EFFECTS OF WIDENING WALERGA ROAD ON SACRAMENTO COUNTY

**Impact 6-5** on page 6-36 of the Draft EIR identifies that impacts for operation of the proposed project on Sacramento County roadways would be less than significant. Under the proposed project, traffic would be redistributed throughout the *Community Plan* area which would result in fewer vehicles traveling on North Antelope Road from the Roseville city limits to PFE Road, additional vehicles on Walerga Road south of the Sacramento County line, and fewer vehicles on Watt Avenue south of the Sacramento County line. This traffic on Walerga Road south of the Sacramento County line would not worsen cumulative LOS F conditions by an increase in the volume to capacity (v/c) ratio of more than 0.05. Roadways in Sacramento County were inadvertently omitted from tables and figures in the Draft EIR, which would have clearly illustrated this conclusion. Also, the statement that all Sacramento County roads would operate at LOS D or better is an error, as Walerga Road would operate at LOS F with or without the proposed project. The Draft EIR is therefore revised as follows:

Page 6-6 of the Draft EIR is revised to state:

No roadway segments were analyzed in ~~either Sacramento or Sutter County~~ as a part of this analysis because the traffic model did not show substantial effects on any of the roadways in this county ~~these counties~~.

**Impact 6-5** on page 6-36 of the Draft EIR, second sentence, is revised as follows:

Compared to the No Project Alternative, the proposed project would have no significant impacts on Sacramento County roadways, ~~as these facilities operate at LOS D or better.~~

The following figures and tables have been updated to include the following Sacramento County roadways: North Antelope Road from the Roseville city limits to Antelope Road, Walerga Road from the Placer County Line to Elverta Road, Watt Avenue from the Placer County Line to Elverta Road.

**Figure 6-2** which follows page 6-6 in the Draft EIR. **Revised Figure 6-2** is at the end of Master Response 5.

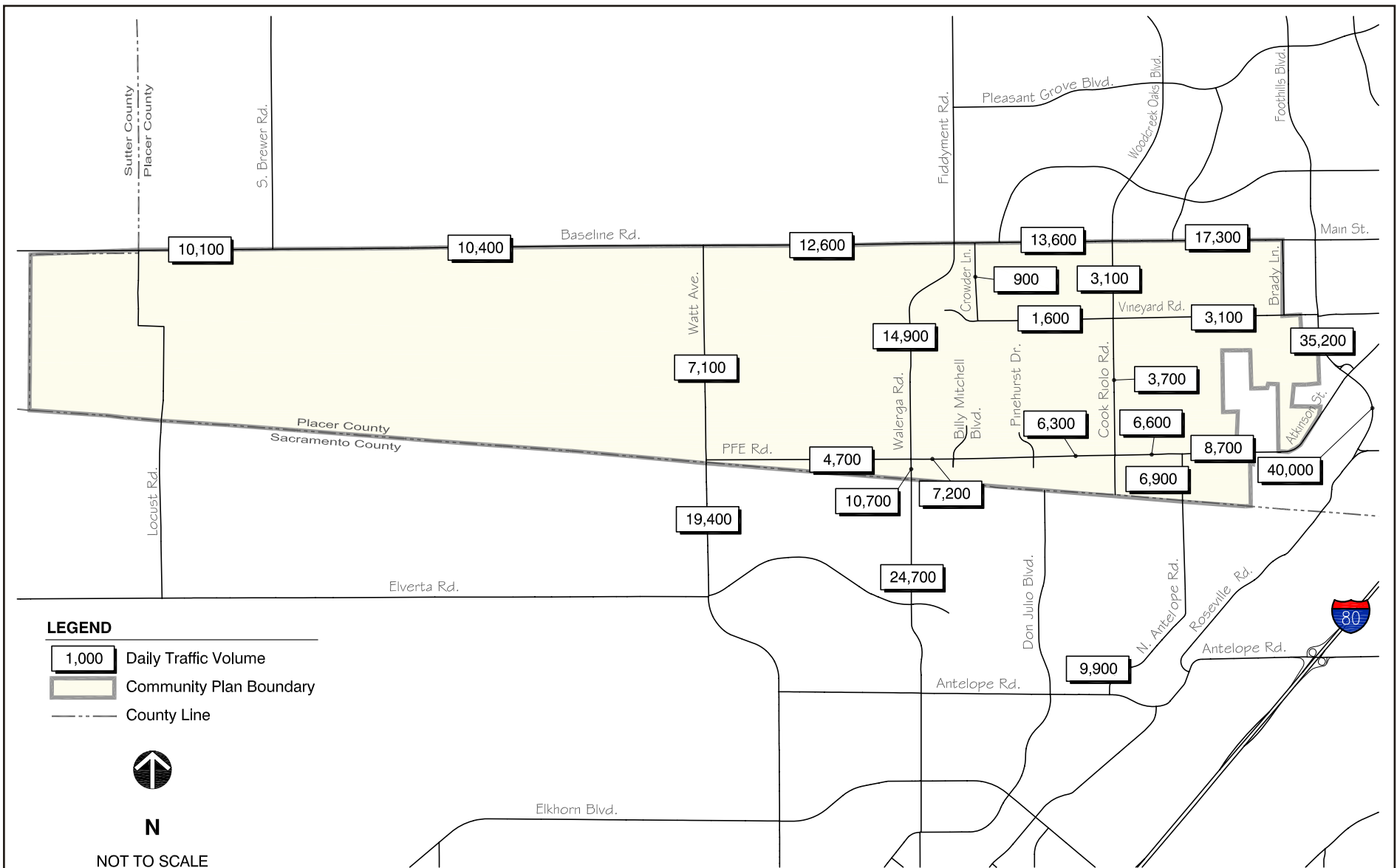
**Table 6-2** on page 6-8 of the Draft EIR. **Revised Table 6-2** is at the end of Master Response 5.

**Figure 6-5** which follows page 6-31 in the Draft EIR. **Revised Figure 6-5** is at the end of Master Response 5.

**Table 6-9** on page 6-33 of the Draft EIR. **Revised Figure 6-9** is at the end of Master Response 5.

**Table 6-10** on page 6-34 of the Draft EIR. **Revised Figure 6-9** is at the end of Master Response 5.

**Figure 7-2** follows page 7-9 in the Draft EIR. **Revised Figure 7-2** is at the end of Master Response 5.



Source:  
Study Area Map, Fehr & Peers, 2009.

## DAILY TRAFFIC VOLUMES - EXISTING ROADWAYS

October 2010  
28067005

Dry Creek/West Placer  
Community Plan Update  
Placer County, CA

**URS**

**REVISED FIGURE 6-2**

**Revised Table 6-2**  
**Existing Conditions Roadway Segment Operations**

Roadway Segment	Classification	Lanes	ADT	LOS
Antelope Rd - PFE Rd to Sacramento County Line	Rolling Terrain Rural Highway	2	6,900	C
North Antelope Rd - Placer County Line to Antelope Rd	Rolling Terrain Rural Highway	2	9,900	D
Baseline Rd - Sutter County Line to Locust Rd	High Access Arterial	2	10,100	B
Baseline Rd - Locust Rd to Watt Ave	High Access Arterial	2	10,400	B
Baseline Rd - Watt Ave to Walerga Rd	High Access Arterial	2	12,600	D
Baseline Rd - Walerga Rd to Cook-Riolo Rd	Moderate Access Arterial	3	13,600	A
Baseline Rd - Cook-Riolo Rd to Foothills Blvd	Moderate Access Arterial	3	17,300	B
Cook-Riolo Rd - Baseline Rd to Vineyard Rd	Level Terrain Rural Highway	2	3,100	B
Cook-Riolo Rd - Vineyard Rd to PFE Rd	Rolling Terrain Rural Highway	2	3,700	B
Crowder Ln - Vineyard Rd to Baseline Rd	Rolling Terrain Rural Highway	2	900	A
Foothills Blvd - Atkinson St to Vineyard Rd <sup>b</sup>	Moderate Access Arterial	4	<b>35,200<sup>a</sup></b>	<b>E</b>
Foothills Blvd - Cirby Way to Atkinson St <sup>b</sup>	Moderate Access Arterial	4	<b>40,000</b>	<b>F</b>
PFE Rd - Watt Ave to Walerga Rd	Level Terrain Rural Highway	2	4,700	B
PFE Rd - Walerga Rd to Pinehurst Dr	Level Terrain Rural Highway	2	7,200	C
PFE Rd - Rawhide Ln to Cook-Riolo Rd	Level Terrain Rural Highway	2	5,800 <sup>a</sup>	B
PFE Rd - Cook-Riolo Rd to Antelope Rd	Rolling Terrain Rural Highway	2	6,600 <sup>a</sup>	C
PFE Rd - Antelope Rd to Atkinson St	Rolling Terrain Rural Highway	2	8,700	C
Vineyard Rd - Crowder Ln to Cook-Riolo Rd	Rolling Terrain Rural Highway	2	1,600 <sup>a</sup>	A
Vineyard Rd - Cook-Riolo Rd to Foothills Blvd	Rolling Terrain Rural Highway	2	3,100	A
Walerga Rd - Baseline Rd to PFE Rd	High Access Arterial	2	<b>14,900</b>	<b>E</b>
Walerga Rd - PFE Rd to Sacramento County Line	Moderate Access Arterial	2	10,700	A
Walerga Rd - Placer County Line to Elverta Rd	Moderate Access Arterial	4	24,700	B
Watt Ave - Baseline Rd to PFE Rd	Moderate Access Arterial	2	7,100	A
Watt Ave - PFE Rd to Sacramento County Line	Rolling Terrain Rural Highway	2	<b>19,400</b>	<b>E</b>
Watt Ave - Placer County Line to Elverta Rd	Moderate Access Arterial	4	19,400	A

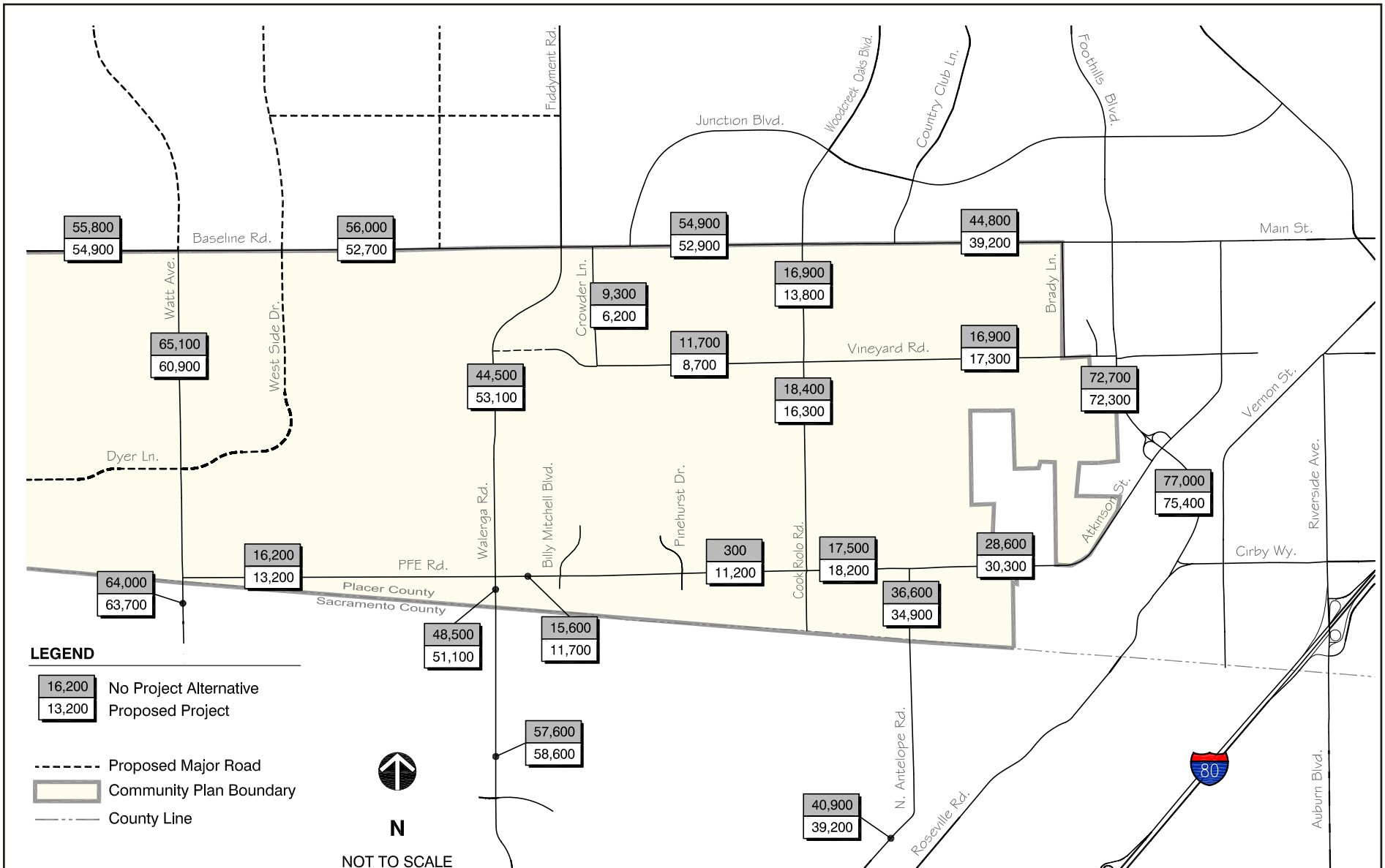
**Source:** Fehr & Peers, 2009a & 2010

**Notes:** Bold and underlined font indicates LOS E or F conditions.

<sup>a</sup> Estimated using 10 times the PM peak-hour volume at an adjacent intersection.

<sup>b</sup> City of Roseville Roadway Segments

[Rows 2, 22, and 25 added in the Final EIR]



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Placer County, CA

**REVISED FIGURE 6-5**

**Revised Table 6-9**  
**Cumulative Conditions Roadway Segment Operations with PFE Road Open**

Roadway Segment	No Project – PFE Road Closed		Proposed Project	
	ADT	LOS	ADT	LOS
Antelope Road - PFE Road to Sacramento County Line	<u>36,600</u>	<u>F</u>	<u>34,900</u>	<u>F</u>
North Antelope Road - Roseville city limits to Antelope Road	<u>40,900</u>	<u>F</u>	<u>39,200</u>	<u>F</u>
Baseline Road - Sutter County Line to Locust Road	43,900	C	43,600	C
Baseline Road - Locust Road to Watt Avenue	<u>55,800</u>	<u>E</u>	<u>54,900</u>	<u>E</u>
Baseline Road - Watt Avenue to Walerga Road	<u>56,000</u>	<u>E</u>	52,700	D
Baseline Road - Walerga Road to Cook-Riolo Road	<u>54,900</u>	<u>F</u>	<u>52,900</u>	<u>F</u>
Baseline Road - Cook-Riolo Road to Foothills Boulevard	<u>44,800</u>	<u>F</u>	<u>39,200</u>	<u>F</u>
Cook-Riolo Road - Baseline Road to Vineyard Road	<u>16,900</u>	<u>F</u>	<u>13,800</u>	<u>E</u>
Cook-Riolo Road - Vineyard Road to PFE Road	<u>18,400</u>	<u>F</u>	<u>16,300</u>	<u>F</u>
Crowder Lane - Vineyard Road to Baseline Road	9,300	B	6,200	A
Foothills Boulevard - Atkinson Street to Vineyard Road	<u>72,700</u>	<u>F</u>	<u>72,300</u>	<u>F</u>
Foothills Boulevard - Cirby Way to Atkinson Street	<u>77,000</u>	<u>F</u>	<u>75,400</u>	<u>F</u>
PFE Road - Watt Avenue to Walerga Road	<u>16,200</u>	<u>F</u>	13,200	D
PFE Road - Walerga Road to Pinehurst Drive	<u>15,600</u>	<u>F</u>	11,700	C
PFE Road - Pinehurst Drive to Cook-Riolo Road	300	A	11,200	C
PFE Road - Cook-Riolo Road to Antelope Road	<u>17,500</u>	<u>F</u>	<u>18,200</u> (+0.04 v/c)	<u>F</u>
PFE Road - Antelope Road to Atkinson Street	28,600	C	30,300	D
Vineyard Road - Crowder Lane to Cook-Riolo Road	11,700	C	8,700	A
Vineyard Road - Cook-Riolo Road to Brady Lane	<u>16,900</u>	<u>F</u>	<u>17,300</u> (+0.02 v/c)	<u>F</u>
Walerga Road - Baseline Road to PFE Road	<u>44,500</u>	<u>F</u>	53,100	D
Walerga Road - PFE Road to Sacramento County Line	<u>48,500</u>	<u>F</u>	51,100	D
Walerga Road - Placer County Line to Elverta Road	<u>57,600</u>	<u>F</u>	<u>58,600</u> (+0.03 v/c)	<u>F</u>
Watt Avenue - Baseline Road to PFE Road	<u>65,100</u>	<u>F</u>	<u>60,900</u>	<u>F</u>
Watt Avenue - PFE Road to Sacramento County Line	<u>64,000</u>	<u>F</u>	<u>63,700</u>	<u>F</u>
Watt Avenue - Placer County Line to Elverta Road	<u>64,000</u>	<u>F</u>	<u>63,700</u>	<u>F</u>

Source: Fehr & Peers, 2009a & 2010

**Notes:**

Bold and underlined font indicates LOS E or F conditions.

ADT – Average daily traffic volume

[Rows 2, 22, and 25 added in the Final EIR]

**Revised Table 6-10  
Cumulative Plus Project Conditions Roadway Classification**

Roadway Segment	Roadway Classification	Number of Lanes	
		No Project – PFE Road Closed	Proposed Project
Antelope Road - PFE Road to Sacramento County Line	<b><u>Moderate Arterial</u></b>	4	4
North Antelope Road - Roseville city limits to Antelope Road	<b><u>Moderate Arterial</u></b>	4	4
Baseline Road - Sutter County Line to Locust Road	Thoroughfare	6	6
Baseline Road - Locust Road to Watt Avenue	Thoroughfare	6	6
Baseline Road - Watt Avenue to Walerga Road	Thoroughfare	6	6
Baseline Road - Walerga Road to Cook-Riolo Road	Moderate Arterial	4	4
Baseline Road - Cook-Riolo Road to Foothills Boulevard	Moderate Arterial	4	4
Cook-Riolo Road - Baseline Road to Vineyard Road	<b><u>Low Rural Arterial</u></b>	2	2
Cook-Riolo Road - Vineyard Road to PFE Road	<b><u>Low Rural Arterial</u></b>	2	2
Crowder Lane - Vineyard Road to Baseline Road	<b><u>Low Rural Collector</u></b>	2	2
Foothills Boulevard - Atkinson Street to Vineyard Road	Moderate Arterial	6	6
Foothills Boulevard - Cirby Way to Atkinson Street	High Arterial	6	6
PFE Road - Watt Avenue to Walerga Road	<b><u>Low Urban Arterial</u></b>	2	4
PFE Road - Walerga Road to Pinehurst Drive	<b><u>Low Rural Arterial</u></b>	2	2
PFE Road - Pinehurst Drive to Cook-Riolo Road	<b><u>Low Rural Arterial</u></b>	2	2
PFE Road - Cook-Riolo Road to Antelope Road	<b><u>Low Rural Arterial</u></b>	2	2
PFE Road - Antelope Road to Atkinson Street	<b><u>Moderate Rural Arterial</u></b>	4	4
Vineyard Road - Crowder Lane to Cook-Riolo Road	<b><u>Low Rural Arterial</u></b>	2	2
Vineyard Road - Cook-Riolo Road to Brady Lane	<b><u>Low Rural Arterial</u></b>	2	2
Walerga Road - Baseline Road to PFE Road	<b><u>Moderate Urban Arterial</u></b>	4	6
Walerga Road - PFE Road to Sacramento County Line	Moderate Urban Arterial	4	6
Walerga Road - Placer County Line to Elverta Road	Moderate Urban Arterial	4	6
Watt Avenue - Baseline Road to PFE Road	<b><u>High Urban Arterial</u></b>	6	6
Watt Avenue - PFE Road to Sacramento County Line	<b><u>High Urban Arterial</u></b>	4	6
Watt Avenue - Placer County Line to Elverta Road	<b><u>High Urban Arterial</u></b>	6	6

**Source:** Fehr & Peers, 2009a & 2010

**Notes:** Bold and underlined font indicates a change in roadway type (usually rural two-lane highway to arterial) from existing conditions as shown in **Table 6-2**.

Shading indicates different number of lanes between No-Project Scenario and the proposed project.

[Rows 2, 22, and 25 added in the Final EIR]





## MASTER RESPONSE 6 – TIMING OF WALERGA ROAD WIDENING

Several commenters expressed concern that the time to decide that Walerga Road should be six lanes was at the time that the Doyle Ranch, Morgan Creek, and Sun Valley Oaks subdivisions were conditioned. However, Placer County notes that these comments relate to issues that do not pertain to the adequacy of the Draft EIR.

At the time that these subdivisions were constructed, the *Community Plan* required that six lanes be constructed, if PFE Road were to be closed. Alternately, Walerga Road was required to be constructed to four lanes if PFE Road were to remain open (refer to Map 5, Alternate D and Map 6, Alternate E in 1990 Dry Creek West Placer Community Plan). These requirements were based upon traffic models that were used to adopt the *Community Plan* back in 1990. Because the closure of PFE Road was not implemented when these subdivisions were conditioned, the County required Walerga Road to be constructed to four lanes. The volume of traffic on PFE Road did not exceed the 5,000 vehicle-per-day threshold to warrant its closure until recently.

The cumulative traffic model that exists today is far different than it was 20 years ago when the original *Community Plan* was implemented in 1990, and even when the referenced subdivisions were conditioned. Traffic patterns and total traffic volumes have increased because of new projects such as Regional University and Community, Riolo Vineyards, Sierra Vista and Placer Vineyards. It became clear that the *Community Plan – Transportation Element* needed to be updated since traffic forecasts in and outside of the *Community Plan* area have changed since the 1990 forecasts.

The current cumulative traffic model described in the Draft EIR forecasts LOS F (excessive delay; jammed conditions) along Walerga Road by 2025 if no changes are made to the roadway network beyond those already planned (see **Table 6-9** on page 6-33 in the Draft EIR). In response to this scenario, the County has developed the proposed project, which includes widening of Walerga Road from four to six lanes from Baseline Road south to the Sacramento County line, which is analyzed in the Draft EIR, and which would result in LOS D (approaching unstable/tolerable delay) on Walerga Road. Walerga Road is characterized as a major arterial within the existing *Community Plan*, because it directly carries traffic to and from both Sacramento County and the City of Roseville.

The County did test an alternative solution (Alternative 2) that would widen not only Walerga Road but also would widen PFE Road and Cook-Riolo Road to four lanes. This scenario assumed that the existing traffic diverter at Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection would also be removed. Alternative 2 would maximize the use of Cook-Riolo Road and PFE Road as a commuter route between Sacramento County and the City of Roseville. In Alternative 2, the resulting LOS on Walerga Road, PFE Road and Cook-Riolo Roads would be LOS C, F, and F, respectively (see **Table 7-8** on page 7-35 in the Draft EIR). The analysis shows that if PFE Road and Cook-Riolo Road were widened, much more traffic would be attracted than PFE Road and Cook-Riolo Road are designed to handle. Both MAC members and residents along these roadways want to keep PFE Road and Cook-Riolo Road as two-lane roadways, in order to minimize the impacts on these roadways. Thus, this alternative was not selected.

The County tested another alternative solution (Alternative 3) that does not widen any roadways within the *Community Plan* area. It proposes to remove the Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection traffic diverter and install speed-reduction treatments on Cook-Riolo Road and PFE Road. The LOS on both Walerga Road and PFE Road would be F (see **Table 7-11** on page 7-47 in the Draft EIR). Alternative 3 would provide the second lowest volumes on Cook-Riolo Road and PFE Road. However, since the speed-reduction treatments would be implemented on PFE Road and Cook-Riolo Road, the LOS is shown to deteriorate on Walerga Road, and thus this alternative was not selected.

The proposed project would widen Walerga Road to six lanes, keep Cook-Riolo Road and PFE Road from Antelope Road to Walerga Road at two lanes, and widen PFE Road from Walerga Road to Watt Avenue to four lanes. This is preferred because it would result in more desirable LOS than all other alternatives described above. The proposed project would provide the least amount of traffic impacts to the *Community Plan* area roadway network as compared to all other alternatives analyzed.

## **MASTER RESPONSE 7 – NOISE IMPACTS ON WALERGA ROAD**

**Chapter 5 (Noise)** in the Draft EIR provides a detailed account of the environmental setting and impact analysis conducted for the entire *Community Plan* area, including sensitive receptors. **Section 5.1.4** in the Draft EIR describes the locations where short-term ambient noise data were gathered and locations where continuous noise level data were gathered, as well as the methodology used to collect each type of data. See **Figure 5-1**, which follows page 5-4 in the Draft EIR, for a depiction of the noise data gathering locations in the *Community Plan* area. Note that noise data was gathered for locations scattered throughout the *Community Plan* area, including along Walerga Road. **Table 5-4** on page 5-10 of the Draft EIR lists the existing traffic noise levels within the *Community Plan* area. At 100 feet from the centerline of Walerga Road, receptors currently experience a traffic noise level of 64.8 decibels  $L_{dn}$ , which is a day-night average.

**Section 5.3.3.1** on page 5-17 of the Draft EIR discusses the construction impacts of the proposed project. **Impact 5-1** on page 5-17 of the Draft EIR regarding noise-related construction impacts associated with the proposed project requires implementation of “Mitigation Measure 5-1a: Develop and Implement a Construction Noise Abatement Program Prior to Construction” to reduce a potentially significant impact to a less-than-significant level. Specific performance standards are included in this mitigation measure, as described in **Section 5.4** on page 5-20 of the Draft EIR. Placer County would approve the Construction Noise Abatement Program, and enforce any violations. A Construction Noise Abatement Program will be prepared for each project. Depending upon the location of the project, the County may require construction noise monitoring for projects adjacent to sensitive receptors. If noise complaints or specific violations occur, feasible noise reduction measures shall be implemented to reduce construction noise impacts. These types of measures would be identified in the Construction Noise Abatement Program, and could include temporary sound walls or curtains, reduced working hours, or modifications to equipment. While the County is able to respond to specific code complaints, the Construction Noise Abatement Program is generally prepared by an acoustical consultant hired by the project contractor or implementing agency at the time of the project. Noise impacts will also be monitored in accordance with the Mitigation Monitoring and Reporting Program prepared for the project, which will be adopted by the Placer County Board of Supervisors at the time it certifies the EIR as complete. This document will define the entities responsible for monitoring.

**Impact 5-2** on page 5-18 of the Draft EIR regarding vibration-related construction impacts associated with the proposed project was found to be less than significant for the following reason: “**Table 5-8** data indicate that construction vibration levels are generally less than the 0.200 in/sec ppv threshold of human annoyance and architectural damage at distances of 25 feet. For vibratory compacting/rolling equipment, slightly greater distances would be required to avoid the 0.200 in/sec ppv threshold. Generally, a distance of 30 feet would be sufficient to achieve compliance with the threshold. Because structures are set back 30 feet or more from the edge of pavement at the locations where construction would occur, vibrations from construction equipment would be less-than-significant.” Placer County recognizes that some structures, such as pools, may be within 30 feet from future construction activities, but because project-specific details regarding exact construction locations associated with the proposed project have yet to be developed it is not possible to estimate vibration-related construction levels at this time. As stated on page 5-18, “construction vibration levels would fluctuate depending on the construction phase, equipment

type, and duration of the use; distance between the noise source and receptor; and the ground conditions between the vibration source and receptor.”

**Section 5.3.3.2** on page 5-19 of the Draft EIR discusses the operations impacts of the proposed project. **Impact 5-3** regarding noise-related operation impacts associated with the proposed project, identifies a significant and unavoidable impact. **Table 5-9** on page 5-21 of the Draft EIR outlines the anticipated noise levels associated with the No Project Alternative and the proposed project. The No Project Alternative assumes four lanes on Walerga Road, while the proposed project assumes six lanes on Walerga Road in the future. As seen on **Table 5-9**, only one impact associated with the proposed project was identified, which was the anticipated noise increase on PFE Road between Pinehurst and Cook-Riolo Road. No other locations were identified as having a significant and unavoidable impact from the proposed project. The noise increase on Walerga Road associated with the proposed project is 0.8 decibels  $L_{dn}$ , which is not considered to be an impact according to Placer County thresholds.

### 3.3 WRITTEN COMMENTS AND RESPONSES

This FEIR section contains the written comments received, and the responses to those comments. Responses generally provide clarifications to the Draft EIR, and occasionally include changes or additions to the text of that document. Additions are shown as underlined and deletions are shown as ~~strike-through~~.

**Community Development**

311 Vernon Street  
Roseville, California 95678-2649

July 22, 2010

Maywan Krach  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

Via: Email and Regular Mail

cdraecs@placer.ca.gov  
Page 1 of 3

**Subject: Dry Creek/West Placer Community Plan Transportation Element Update  
Draft EIR Comments**

Dear Ms. Krach:

Thank you for the opportunity to provide comment on the draft EIR prepared for the Dry Creek/West Placer Community Plan Transportation Element Update. In general the City supports the following options included in the Plan:

- Modification of the Community Plan to allow for PFE Road to remain open;
- Modification of the intersection of Woodcreek Oaks and Baseline Road to allow for north and south through movements.

It should be noted that the proposal to remove the median barrier at the intersection of Woodcreek Oaks Blvd./Cook Riolo Rd. and Baseline Road does not take into account the existing negative impacts that the median is having on the neighborhood on the northeast corner of the intersection (see attached exhibit). Because traffic is prohibited from going straight through this intersection the adjacent neighborhood receives and is impacted by substantial cut-through traffic. One of the overall goals of the Dry Creek Community Plan Update is that "Through traffic shall be directed to appropriate routes in order to maintain public safety...". Most vehicles that need to use Cook Riolo Rd. are not "through" traffic but rather residents and students that need to access their own neighborhoods and school sites. Most vehicles that previously used Cook Riolo Rd. as a "cut through" are now using the improved Walerga Rd. The barrier currently does not serve as a deterrent to "through" traffic on Cook Riolo Rd. but instead causes vehicles to cut through the Faulkner/Caswell neighborhood. The City of Roseville has conducted several studies of driver tendencies related to this intersection and determined the following:

- Over 50% of the traffic on Caswell Dr. and Faulkner Dr. are from vehicles who reside outside the City of Roseville and over 30% of the vehicles are from the Dry Creek Community and Antelope.
- Dry Creek School buses use this route as a cut-through.
- There is on average 42 violations per day from vehicles that illegally go around the island.

1-1

1-2

In addition to supporting the above options, the City offers the following specific comments related to the Plan.

1. Table 6 lists the Elverta Plan Area as being in Roseville. This is incorrect; it should be listed in Sacramento County.
2. Table 7 identifies the improvements to Baseline Road from Foothills to Walerga, and the improvements to Atkinson Road between PFE and Foothills Boulevard as being complete. This reference to the improvements being complete should be removed.
3. Figure 9 identifies intersection configuration under the cumulative scenario. Intersections 4 and 5 are incorrect. Intersection 4 should reflect six lanes in the north/south direction. Intersection 5 identifies six lanes in the east/west direction. This should be reflected as four lanes. It would also be beneficial to reflect intersection level of service for all locations within the study area, with and without the proposed project.
4. Figure 9 does not reflect intersection volumes assuming modifications to the intersection of Woodcreek Oaks and Baseline. This information should be reflected within the document.

1-3

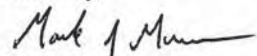
1-4

1-5

1-6

Thank you for your consideration of our comments. If you have any questions on this matter, please do not hesitate to contact me at 916-774-5334.

Sincerely,



Mark Morse  
Environmental Coordinator

cc: Jana Cervantes





EXHIBIT 1

## RESPONSE TO COMMENT LETTER 1

**Response 1-1:** The City of Roseville's support for the project is noted.

**Response 1-2:** Placer County acknowledges the safety concerns caused by the traffic diverter at the Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection. This commenter, as well as many other commenters, suggests that safety, speeding, and cut-through traffic on Faulkner Drive and Caswell Drive in the City of Roseville are a direct result of the traffic diverter. The proposed project should alleviate the safety, speeding, and cut-through traffic concerns by allowing traffic to travel in a north/south direction on Cook-Riolo Road/Woodcreek Oaks Boulevard.

The Draft EIR analyzed the effects of both keeping the traffic diverter in place (the No Project Alternative and Alternative 5, as discussed in **Chapter 7** of the Draft EIR) and removing the traffic diverter (the proposed project and all other alternatives discussed in **Chapter 7**). An analysis of future traffic conditions in the *Community Plan* area and surrounding areas determined that removing the traffic diverter and constructing speed-reduction treatments on Cook-Riolo Road and PFE Road would provide the best traffic solution. The decision to remove or leave the traffic diverter in place will be made by the Placer County Board of Supervisors.

**Response 1-3:** **Table 6** of the *Update to the Dry Creek/West Placer Community Plan – Draft Transportation Element* is corrected to show the Elverta Plan Area in Sacramento County, as shown on the following page. **Table 6-5** on page 6-24 of the Draft EIR is also corrected, and shown at the end of Response to Comment 1-2.

**Response 1-4:** **Table 7** of the *Update to the Dry Creek/West Placer Community Plan – Draft Transportation Element* is corrected to remove the indication that improvements on Baseline Road from Foothills to Walerga and on Atkinson Road between PFE and Foothills Boulevard are complete, as shown on the following page. **Table 6-8** on page 6-25 of the Draft EIR is also corrected, and shown at the end of Response to Comment 1-2.

**Response 1-5:** As noted in **Table 8** of the *Update to the Dry Creek/West Placer Community Plan – Draft Transportation Element*, Fiddymont Road north of Baseline Road was assumed to have four lanes. Therefore, the lane configuration for the Baseline Road/Fiddymont Road/Walerga Road intersection (#4) does not have three through lanes on the northbound and southbound approaches. Also noted in **Table 8**, Baseline Road was assumed to be widened to six lanes near the Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection (#5) approaches, so the intersection configuration reflects three through lanes in the eastbound and westbound direction. **Figure 9** does not need to be modified as it shows the assumed future lane configurations used in the cumulative traffic model.

**Table 6-9** on page 6-33 and **Table 6-11** on page 6-37 in the Draft EIR show the anticipated LOS for the *Community Plan* area roadways and intersections under the No Project Alternative and proposed project.

**Response 1-6:** **Figure 9** of the *Update to the Dry Creek/West Placer Community Plan – Draft Transportation Element* is revised to show the northbound and southbound through volumes at the Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection, and shown at the end of Response to Comment 1-2. **Figure 6-6**, which follows page 6-38, in the Draft EIR is also revised, and shown at the end of Response to Comment 1-2.



**Revised Table 6  
Regional Land Use Assumptions**

Jurisdiction	Plan Area	Residential (dwelling units)	Employment (thousand square feet)			College Enrollment
			Retail	Office	Industrial	
Lincoln	General Plan	22,123	2,948	3,622	8,161	5,000
	Sphere of Influence Expansion	15,000	1,875	4,000	0	0
Placer County	Sunset Industrial	0	357	912	7,851	0
	Regional University	4,387	215	27	0	6,000
Rocklin	General Plan	28,606	4,586	2,848	3,622	23,000
Roseville	General Plan	60,002	14,400	15,319	17,401	0
	Placer Ranch	6,758	900	2,213	1,387	25,000
	Sierra Vista	10,756	1,323	436	0	0
	Creekview	2,600	300	0	0	600
	<del>Elverta</del>	<del>4,950</del>	<del>195</del>	<del>58</del>	<del>0</del>	<del>0</del>
Sacramento County	South Sutter	8,750	1,094	750	1,500	0
	<del>Elverta</del>	<del>4,950</del>	<del>195</del>	<del>58</del>	<del>0</del>	<del>0</del>
Sutter County	South Sutter	8,750	1,094	750	1,500	0

**Sources:** DKS Associates, 2005; Fehr & Peers, 2006

**Note:** Sierra Vista has been revised to 6,650 residential units in 2009. This change is not included in the traffic model assumptions.

**Revised Table 6-5  
Regional Land Use Assumptions**

Jurisdiction	Plan Area	Residential (dwelling units)	Employment (thousand square feet)			College Enrollment
			Retail	Office	Industrial	
Lincoln	General Plan	22,123	2,948	3,622	8,161	5,000
	Sphere of Influence Expansion	15,000	1,875	4,000	0	0
Placer County	Sunset Industrial	0	357	912	7,851	0
	Regional University	4,387	215	27	0	6,000
Rocklin	General Plan	28,606	4,586	2,848	3,622	23,000
Roseville	General Plan	60,002	14,400	15,319	17,401	0
	Placer Ranch	6,758	900	2,213	1,387	25,000
	Sierra Vista	10,756	1,323	436	0	0
	Creekview	2,600	300	0	0	600
	<del>Elverta</del>	<del>4,950</del>	<del>195</del>	<del>58</del>	<del>0</del>	<del>0</del>
Sacramento County	South Sutter	8,750	1,094	750	1,500	0
	<del>Elverta</del>	<del>4,950</del>	<del>195</del>	<del>58</del>	<del>0</del>	<del>0</del>
Sutter County	South Sutter	8,750	1,094	750	1,500	0

**Sources:** DKS Associates, 2005; Fehr & Peers, 2006

**Note:** Sierra Vista has been revised to 6,650 residential units in 2009. This change is not included in the traffic model assumptions.

**Revised Table 7**  
**Community Plan Area Roadway Assumptions**

Roadway	Improvement	Source
Antelope Rd	Widen from 2 to 4 lanes, Sacramento County to PFE Rd	County
Atkinson St	Widen from 2 to 4 lanes, PFE Rd to Foothills Blvd	Roseville/MTP
Baseline Rd	Widen from 2 to 6 lanes, Pleasant Grove Rd to Walerga Rd	County
Baseline Rd	Widen from 3 to 4 lanes, Walerga Rd to Foothills Blvd	Roseville/MTP
Cook-Riolo Rd	Replace one lane bridge at Dry Creek with two-lane bridge with shoulders	County
Foothills Blvd	Widen from 4 to 6 lanes, Cirby Way to Atkinson St *	MTP
Foothills Blvd	Widen from 5 to 6 lanes, Atkinson St to Vineyard Rd *	MTP
PFE Road	Widen from 2 to 4 lanes, Antelope Rd to Atkinson St	Roseville
Walerga Rd	Widen from 2 to 4 lanes, Baseline Rd to Sacramento County	Unknown
Watt Ave	Widen from 2 to 6 lanes, PFE Rd to Baseline Rd	County
16 <sup>th</sup> St	Extend from Sacramento County and widened as 4 lanes <sup>a</sup>	County
Dyer Ln	Extend to Baseline Rd and widened as 4 lanes <sup>a</sup>	County

**Source:** Placer County, 2004

**Notes:** MTP – Metropolitan Transportation Plan

\* Improvement now complete [the asterisks (\*) are deleted in rows 2 and 4 of the Roadway column in the Final EIR]

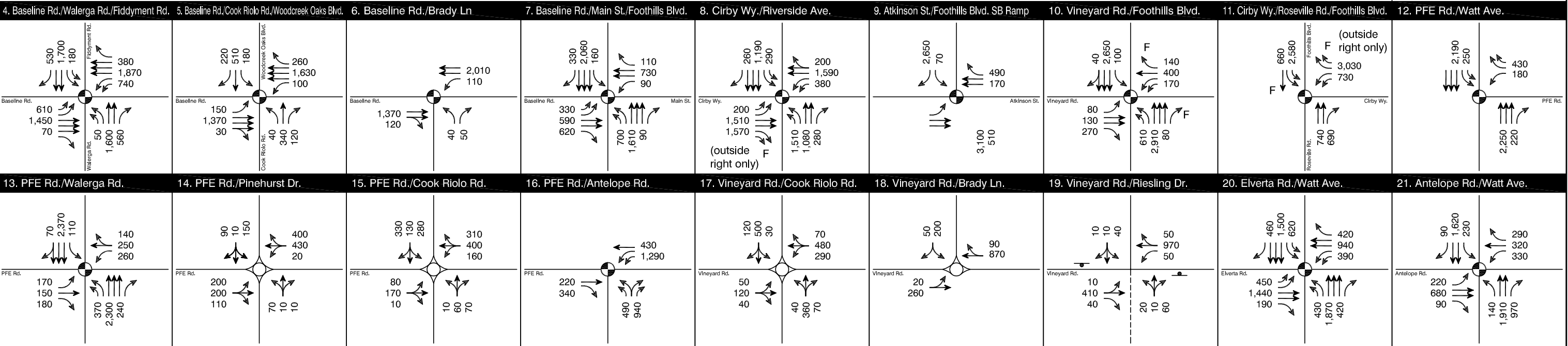
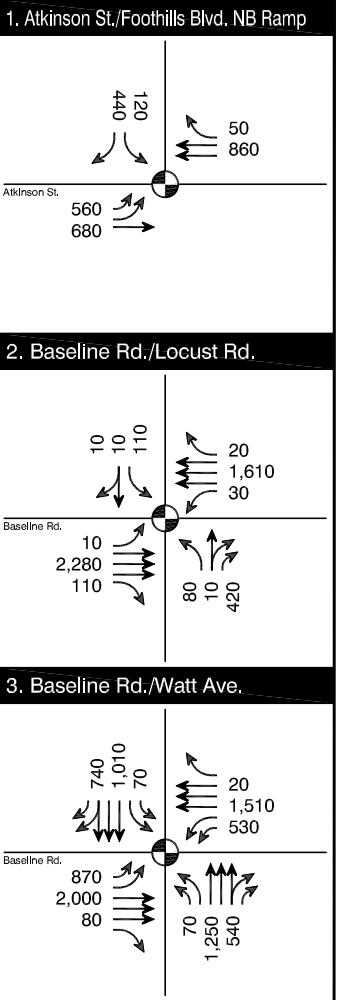
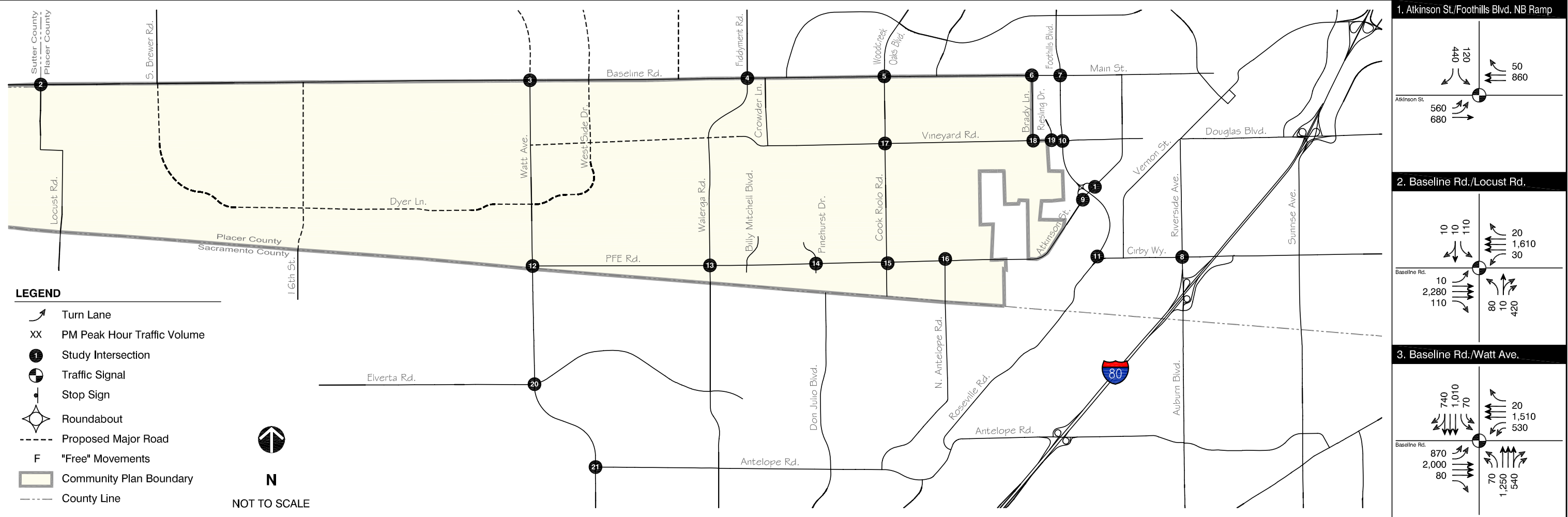
**Revised Table 6-8**  
**Community Plan Area Roadway Assumptions**

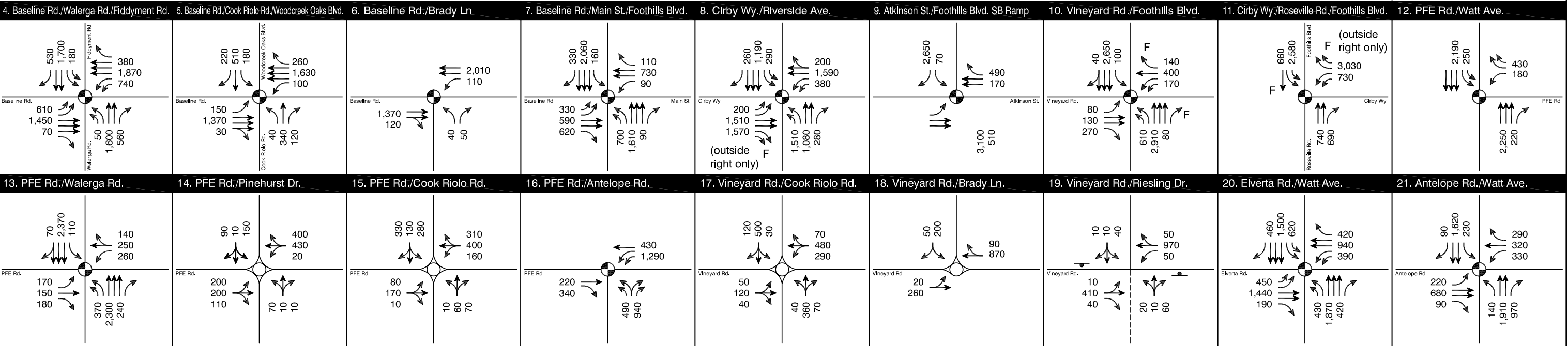
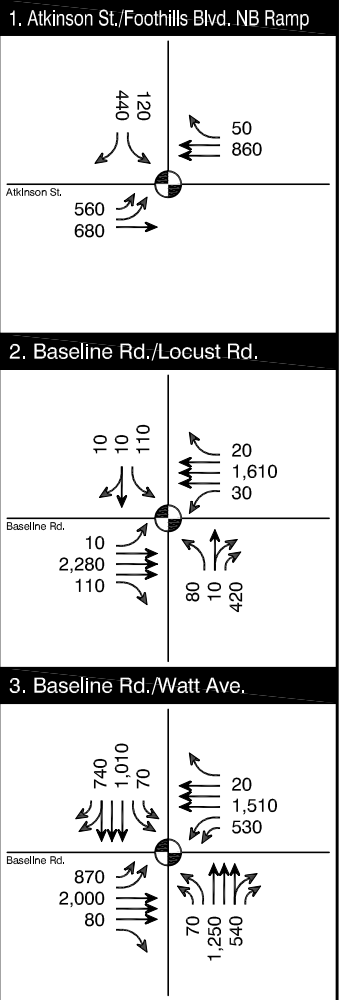
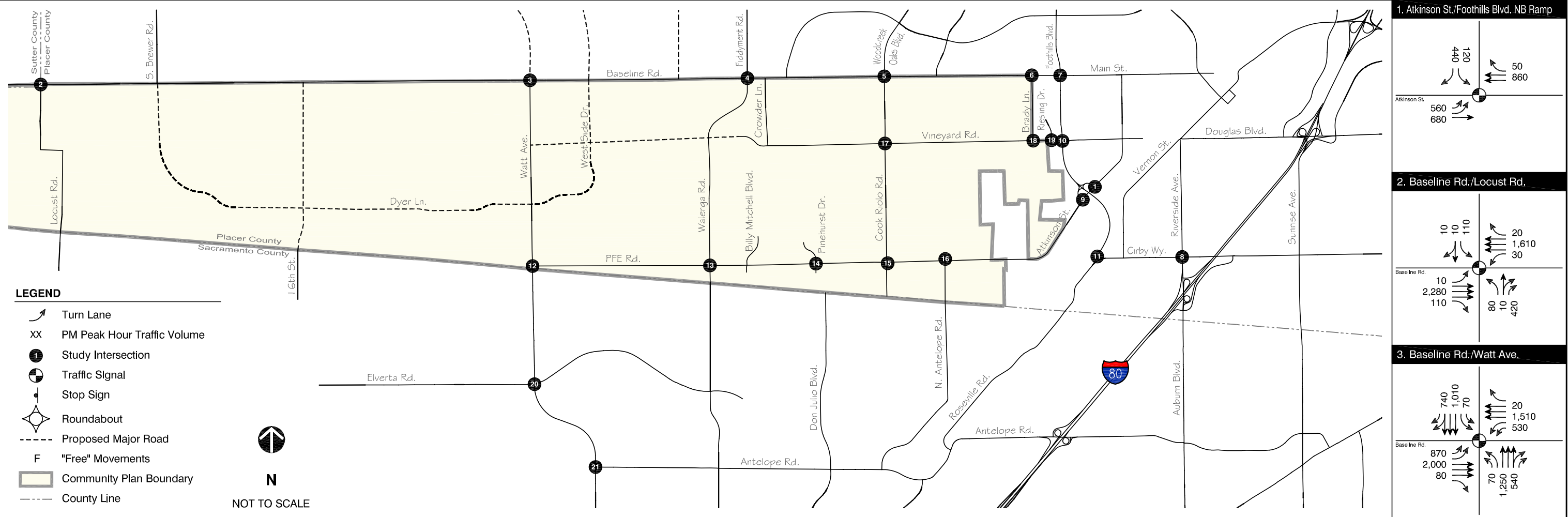
Roadway	Improvement	Source
Antelope Rd	Widen from 2 to 4 lanes, Sacramento County to PFE Rd	County
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Baseline Rd	Widen from 2 to 6 lanes, Pleasant Grove Rd to Walerga Rd	County
Baseline Rd	Widen from 3 to 4 lanes, Walerga Rd to Foothills Blvd	Roseville/MTP
Cook-Riolo Rd	Replace one lane bridge at Dry Creek with two-lane bridge with shoulders	County
Foothills Blvd	Widen from 4 to 6 lanes, Cirby Way to Atkinson St *	MTP
Foothills Blvd	Widen from 5 to 6 lanes, Atkinson St to Vineyard Rd *	MTP
PFE Road	Widen from 2 to 4 lanes, Antelope Rd to Atkinson St	Roseville
Walerga Rd	Widen from 2 to 4 lanes, Baseline Rd to Sacramento County	Unknown
Watt Ave	Widen from 2 to 6 lanes, PFE Rd to Baseline Rd	County
16 <sup>th</sup> St	Extend from Sacramento County and widened as 4 lanes <sup>a</sup>	County
Dyer Ln	Extend to Baseline Rd and widened as 4 lanes <sup>a</sup>	County

**Source:** Placer County, 2004

**Notes:** MTP – Metropolitan Transportation Plan

\* Improvement now complete [the asterisks (\*) are deleted in rows 2 and 4 of the Roadway column in the Final EIR]





**From:** James Navicky  
**To:** Maywan Krach  
**cc:** James Navicky  
**Subject:** PEIR T20070805 - SCH# 2007122051 The Dry Creek / West Placer County Community Plan – Transportation Element Update  
**Date:** Monday, July 26, 2010 3:11:55 PM

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Maywan Krach  
 Community Development Technician  
 County of Placer  
 Community Development Resources Agency  
 3091 County Center Drive, Suite 190  
 Auburn, CA 95603

Dear Ms. Krach,

The Department of Fish and Game (Department) has reviewed the Dry Creek / West Placer County Community Plan – Transportation Element Update (PEIR T20070805) (SCH# 2007122051). The Dry Creek / West Placer County Community Plan – Transportation Element Update (Project) proposes to update the transportation element of the western Placer County's community plan. Features of the Project include: Keeping PFE Road open and constructing speed reduction treatments of PFE Road and Cook-Riolo Road to preserve the rural character of the community.

Significant natural resources occurring in or adjacent to the Project area include wetlands, stream environments associated with the lower reaches of Dry Creek, riparian habitats, and annual grass lands. These resources provide habitat for listed and sensitive wildlife species such as, but not limited to: Chinook salmon (*Oncorhynchus tshawytscha*), steelhead trout (*O. Mykiss*), and Swainson's hawk (*Buteo swainsoni*).

The Department is concerned that the project, as proposed, may result in significant cumulative impacts to wildlife resources as the result of direct and indirect impacts and habitat fragmentation to an extent greater than identified in the draft EIR.

A review of the information contained in the draft EIR indicates that the draft EIR fails to include an analysis of the Project's total impacts. A map (Figure 3-6) found on page 3-9 indicates that Walerga Road will be widened from 4 to 6 lanes from PFE Road to Baseline Road. To accomplish the road widening a new bridge or reconstruction of the existing bridge would need to occur at the location where Walerga Road crosses Dry Creek. The draft EIR fails to discuss the bridge's construction, construction related impacts, and loss of habitat associated with construction of the bridge. The Department recommends that the draft EIR be revised to include an analysis of the impacts associated with the construction of the Walerga Road at Dry Creek Bridge. The analysis should focus on impacts to riparian habitat, tress loss, Chinook salmon, and steelhead trout.

In general, such impacts result whenever a proposed project involves work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel, including ephemeral streams and water courses. Impacts triggering regulation by the DFG under these provisions of the Fish and Game Code (Sec. 1600) typically result from activities that:

- Divert, obstruct, or change the natural flow or the bed, channel or bank of any river, stream, or lake;
- Use material from a streambed; or
- Result in the disposal or deposition of debris, waste, or other material where it may pass into any river stream, or lake.

2-1

2-2



In the event implementation of the proposed project involves such activities, and those activities will result in reasonably foreseeable substantial adverse effects on fish or wildlife, a Lake or Streambed Alteration Agreement (LSAA) will be required by the DFG. Because issuance of a LSAA is subject to review under the California Environmental Quality Act (CEQA), the DEIR should analyze whether the potentially feasible mitigation measures set forth below will avoid or substantially reduce impacts requiring a LSAA from the DFG.

Thank you for the opportunity to review the project. If you have any questions, please let me know.

Regards,

James J. Navicky  
Staff Environmental Scientist  
CA Dept. of Fish & Game  
1701 Nimbus Road  
Rancho Cordova, CA 95670  
(916) 358-2926  
(916) 358-2912 fax  
jnavicky@dfg.ca.gov

## RESPONSE TO COMMENT LETTER 2

**Response 2-1:** The proposed project is limited to enhancing the existing roadway system in the *Community Plan* area. The existing roadway system is located between the urbanized areas of northern Sacramento County and the City of Roseville. No new roadways are proposed.

Biological resource impacts were evaluated as a part of the NOP/IS, included in the Draft EIR as **Appendix A**. As a part of that analysis, it was determined that the minor amount of additional pavement that would be added to the existing roadway system as a result of the proposed project would result in no significant impacts regarding habitat fragmentation or interference with the movement of native resident migratory fish or wildlife species. As stated on page 16 of the NOP/IS, “The proposed project is not adjacent to or within any wildlife or fish migratory corridors.” Note, the proposed project evaluated in the NOP/IS did not include an analysis of the Walerga Bridge Replacement Project. The bridge project was previously analyzed in a separate environmental document, as it is a separate project. An MND was prepared and received by the State Clearing House on January 23, 2009, a copy of which is on file at the Placer County Department of Public Works (refer to State Clearing House # 2008102100). This MND and its accompanying Initial Study analyzed the impacts of the construction of this bridge. This MND was approved by the Placer County Board of Supervisors on January 13, 2009.

Subsequent to preparation of the NOP/IS, three new elements were added to the proposed project and were separately evaluated as a part of the Draft EIR. The three new elements included widening of selected *Community Plan* area roadways (i.e., Watt Avenue, Walerga Road, and PFE Road) as described in **Section 2.2.2** on page 2-5 in the Draft EIR. As explained in **Section 3.5.2**, which starts on page 3-14 in the Draft EIR, the majority of permanent ground disturbance associated with the proposed project would occur in previously disturbed areas, with the temporarily disturbed areas returned to pre-project conditions after construction is complete. No new roadways are proposed. Because no new roadways are proposed and the scale of impact is located immediately adjacent to existing roadways, biological impacts associated with the proposed project would be similar to those described in the NOP/IS.

Both the NOP/IS and Draft EIR evaluation determined that the proposed project could result in significant impacts to special-status species, including displacement and possible mortality. Recommended avoidance, minimization, and mitigation measures were developed to reduce significant impacts regarding displacement and possible mortality to a less-than-significant level. Please see pages 2-8 through 2-14 of the Draft EIR for a summary of the NOP/IS and Draft EIR biological resource evaluation and proposed mitigation measures associated with the proposed project.

Please also see Master Response 3.

**Response 2-2:** The purpose of updating the *Community Plan – Transportation Element* was to determine the roadway network necessary for, and adoption of, the appropriate level of service (LOS) standards that will accommodate future cumulative buildout of the *Community Plan* area and surrounding areas. The Draft EIR analyzed the proposed project at a program level because this is the appropriate level of analysis for a plan, and because project-specific details will be determined once the plan is approved and funding is available for development of specific plan components. Please also see Master Response 3.



ARNOLD SCHWARZENEGGER  
GOVERNOR

July 27, 2010

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT  
DIRECTOR

RECEIVED

JUL 30 2010

ENVIRONMENTAL COORDINATION SERVICES

Maywan Krach  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 220  
Auburn, CA 95603

Subject: Dry Creek/West Placer Community Plan - Transportation Element Update (PEIR T20070805)  
SCH#: 2007122051

Dear Maywan Krach:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 23, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

3-1



**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2007122051  
**Project Title** Dry Creek/West Placer Community Plan - Transportation Element Update (PEIR T20070805)  
**Lead Agency** Placer County

**Type** EIR Draft EIR  
**Description** NOTE: Review Per Lead

As a part of the Transportation Element Update, the Placer County Department of Public Works proposes to keep PFE Road open and to construct speed reduction treatments on PFE Road and Cook-Riolo Road to preserve the rural character of the Community Plan area. The County would also review the Community Plan's transportation goals and policies for relevance to today's community environment and to ensure applicability in the future.

**Lead Agency Contact**

**Name** Maywan Krach  
**Agency** Placer County Community Development Resource Agency  
**Phone** (530) 745-3132 **Fax**  
**email**  
**Address** 3091 County Center Drive, Suite 220  
**City** Auburn **State** CA **Zip** 95603

**Project Location**

**County** Placer  
**City** Roseville  
**Region**  
**Lat / Long**  
**Cross Streets** PFE Road and Cook Riolo Road  
**Parcel No.**  

<b>Township</b>	<b>Range</b>	<b>Section</b>	<b>Base</b>
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**Proximity to:**

**Highways** I-80  
**Airports** Pruet  
**Railways** Southern Pacific  
**Waterways** Dry Creek  
**Schools** Dry Creek Elementary School  
**Land Use** General Plan: Low Density Residential (1-2 dwellings per acre), Medium Density Residential (4-6 dwellings per acre), Commercial, and Agriculture.  
Zoning: Residential Single Family (RS) and Agriculture combining a 20,000 square foot minimum (AG-B-20).

**Project Issues** Air Quality; Noise; Traffic/Circulation

**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 2; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Management Agency, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 3; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; Regional Water Quality Control Bd., Region 5 (Sacramento); Native American Heritage Commission; Public Utilities Commission

**Date Received** 06/07/2010 **Start of Review** 06/07/2010 **End of Review** 07/23/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

## RESPONSE TO COMMENT LETTER 3

**Response 3-1:** Comment noted.

**From:** Johnna  
**To:** Placer County Environmental Coordination Services;  
**Subject:** RE: Baseline/Cook Riolo/Woodcreek Oaks Median Barrier  
**Date:** Monday, June 14, 2010 4:07:39 PM  
**Attachments:** CR\_WOB\_Intersection.doc

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Maywan Krach  
Placer County Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, California 95603

Please see attached copy of a document I developed and sent to Jana Cevantes last summer.

I have personally witnessed many drivers turning left off Woodcreek Oaks Blvd, onto Faulkner Dr, right onto Caswell Dr, right onto Baseline, and finally left onto Cook Riolo Road - a ridiculous maneuver which unnecessarily endangers life and safety on two residential streets.

4-1

Please do all you can to end this dangerous -yes, silly- traffic pattern!

Sincerely,  
John Clark  
Roseville, CA

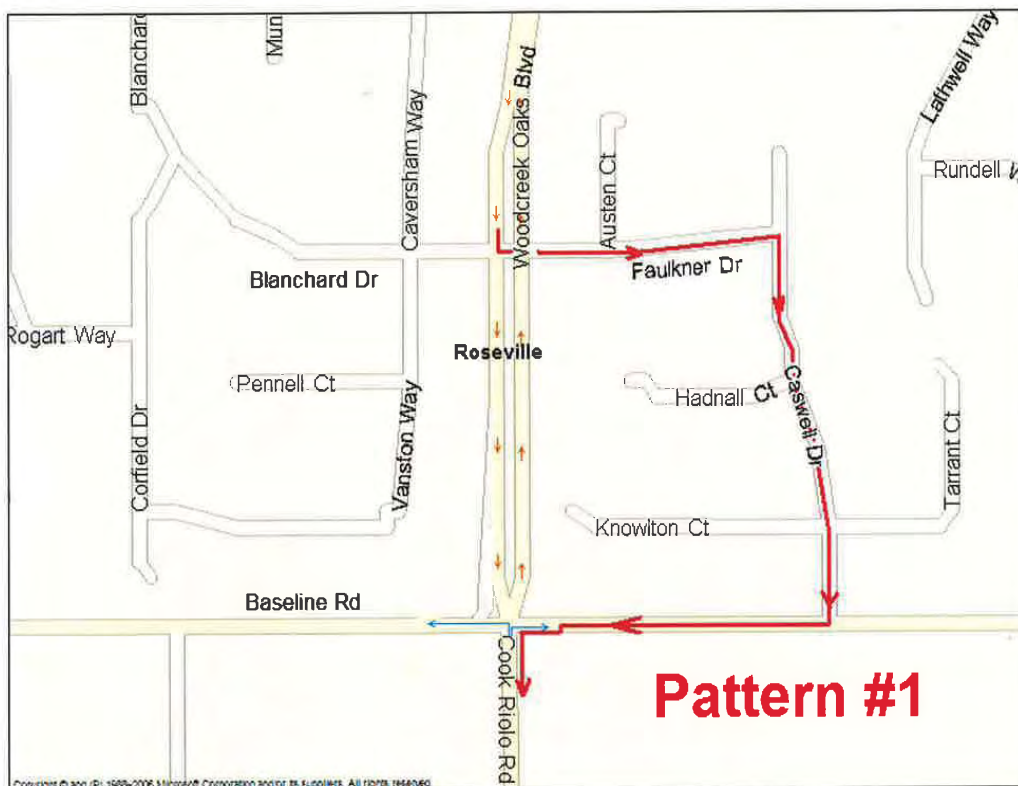
## *Unintended/unwanted Roseville, CA Traffic Patterns*

06/27/2009

### **Pattern #1**

Situation: Traffic heading South on Woodcreek Oaks Blvd is not allowed to enter Cook-Riolo Rd (must turn Left or Right on Baseline Rd). To compensate for this situation, cars and trucks heading for the developments such as Morgan Creek and other destinations in the area, drive the pattern shown in red. This vastly increases the traffic on Faulkner Drive and Caswell Dr. In addition to being a nuisance to the residents on these two streets, it creates a dangerous situation for children and other pedestrians. It can be hypothesized that drivers taking this route speed up a little to make up for the difference in the driving distance. Please note that traffic is **not** substantially reduced on Cook-Riolo Rd as intended by this outdated rule.

4-1



## **Pattern #2**

Situation: Traffic heading North on Cook-Riolo Rd is not allowed to enter Woodcreek Oaks Blvd (must turn Left or Right on Baseline Rd). To compensate for this situation, cars and trucks heading for the developments on the North side of Baseline Drive, Woodcreek High School, and other destinations in the area, drive the pattern shown in blue. This vastly increases the traffic on Caswell Dr and Faulkner Drive. In addition to being a nuisance to the residents on these two streets, it creates a dangerous situation for children and other pedestrians. It can be hypothesized that drivers taking this route speed up a little to make up for the difference in the driving distance. Please note that traffic is **not** substantially reduced on Cook-Riolo Rd as intended by this outdated rule.

4-1





### **Proposed Study**

To investigate the validity of the unintended traffic patterns described above, I propose that the Roseville Traffic Department study these patterns for a period of time –both in the Summer months and during the Fall when Woodcreek High School is in session. While I am no expert, it would appear that by placing counters at the entrance to Faulkner Dr from Woodcreek Oaks Blvd and at the entrance to Caswell Rd from Baseline Rd, and one across the left-turn lane onto Cook-Riolo from Baseline Rd would substantiate my claim. Another counter placed at the ingress and egress points of Blanchard Dr (across Woodcreek Oaks Blvd from Faulkner Dr) would show a vast difference in traffic volume between these two very similar residential areas.

### **Proposed solutions**

This old traffic rule is outdated and ineffectual. It certainly causes more problems than it cures. Along with hundreds of residents on both sides of Baseline Drive in this area, I strongly recommend:

1. Remove the present restriction and make the intersection of Woodcreek Oaks Blvd and Cook-Riolo road a "normal" intersection.
2. If recommendation 1 cannot be effected immediately, in the interim place "NO THROUGH TRAFFIC" signs at the entrance to both Caswell and Faulkner Drives.

John Clark  
Roseville, CA

4-1

## **RESPONSE TO COMMENT LETTER 4**

**Response 4-1:** Please see Response to Comment 1-2.

**From:** Vicki  
**To:** Placer County Environmental Coordination Services;  
**Subject:** wrong address listed on Notice  
**Date:** Wednesday, June 16, 2010 9:56:29 AM

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Hello,

I was reading the Notice you sent out yesterday regarding the Draft EIR and I noticed there were two address's listed on the form. It listed the meeting place as 3901 and the mailing address to Ms. Krach as 3091. You might need to send out another form so the public will get to the public meeting on the 22nd of July.

Regards  
Vicki Bohlin



**From:** Vicki  
**To:** Placer County Environmental Coordination Services;  
**cc:** vbohin@surewest.net;  
**Subject:** Comments on Draft EIR on Update to Dry Creek/  
West Placer Community Plan dated June 2010  
**Date:** Thursday, July 15, 2010 9:22:49 AM

---

Tom & Vicki Bohlin  
4520 Waterstone Dr  
Roseville CA 95747-  
6361

To Whom it May Concern,

After receiving a copy of the notice a few weeks ago I reviewed the content of the DEIR with some of my neighbors. I live in the affected area (Morgan Creek off Walerga) and there are parts of the EIR that I am very concerned about. I have listed them below.

- Construction impacts in section 5.3.3.1 are described as "potentially significant". I believe the DEIR needs to be revised to include the information on mitigation measures that will be carried out. 5-2
- Operational impacts in section 5.3.3.2 are described as "significant and unavoidable". The mitigation is described as "no mitigation" - how could that be?? My home backs up to Walerga and I have spent a fortune on putting in a backyard to enjoy for many years to come and by the description in this section you do not plan to do anything to buffer the noise or address the safety issue if for instance a vehicle comes into my yard during the construction or after. This section needs to be re-addressed in regards to adding mitigation. 5-3
- The DEIR seems to be significantly lacking in both detail and accuracy. It does not consistently analyze the impacts of widening Walerga Road. It does not discuss anything about the bridge over dry creek - this will, of course, affect the traffic flow during construction, impact the natural resources and the current trails we have in our area. There is also no discussion on what the new built out section by Morgan Creek will look like. It just indicates a 6' wall will be constructed and the sidewalk and landscaping will be "optional"! 5-4
- I talked to Mr. Vassion a few weeks ago and he stated that the hillside on the Morgan creek side ( with trees/landscaping) is an easement and would be removed. I asked him about the current wrought iron/block fence - he that would also be removed and a wall would be put up. He also said the Oak trees on the Doyle Ranch side would need to be removed. I have MANY issues regarding that !! I am sure you can figure that one out! 5-5
- Traffic is also a major concern to me. It seems that Cook Riolo, Vineyard, etc. are being kept as "rural". I believe the traffic should be distributed 5-6



equally throughout the community and maybe some other North/South roads should be added as the new housing construction moves forward. Walerga is 5 miles from the freeway and is certainly NOT a quick ride to the freeway. Once you get on Walerga and Elkhorn in Sac. County it is only 4 lanes with many traffic signals. Currently Fideyement North of Baseline is 2-4 lanes. How is all this going to work out with us being 6 lanes and the other areas are only 4 lanes at best. People already use Walerga by Morgan Creek as a raceway - they try to get past the other vehicles before it changes to 1 lane each way again. The CHP has given many tickets in this area and in the last month there has been 4 accidents on this stretch of the road.

5-6

- I believe the Transportation element Policy 6 should be revised. It leaves the streetscape elements such as sidewalks, bike trails, landscaping in the hands of the county staff. This is of concern to me because I bought this home 2 years ago (not knowing about this Community Plan that appears to be around since 1990) and had the expectation that it would keep to the high standard of living we currently have. We moved here to be far from the freeway, close to the rural area (2 minutes from my home you can find horses, cattle, sheep, goats, etc) and enjoy the beauty of the area in a guarded/safe community with a lake and golf course.
- There are MANY safety issues that need to be looked at such as - children waiting for the school buses in front of the Walerga entrance, H/O's trying to turn right onto Walerga (currently we have an "excuse me" lane where we can wait until the road looks clear, the greeter cottage will probably need to be moved back to accommodate the traffic flow into MC (currently we have an extra lane where the vehicles can wait to approach the greeter (security officer). Several people ride their bikes and/or walk to the many different trails - including Dry Creek and having the road 6 lanes would make it even more hazardous for pedestrians/bikers. The safety and efficiency of traffic movement is also of great concern.
- What about the traffic impact at the Sacramento Co. line? How is forcing 6 lanes into max 4 lanes "less than significant"? We need to share the burden of traffic with neighboring jurisdictions.
- On page 3 of the DEIR it says "The design of any new road or major change within the Community Plan area shall assure that the scenic and rural qualities of the area will be maintained. Such design shall minimize impacts upon agricultural lands, natural resources, and historic sites." Doesn't that contradict what you are planning on doing to Walerga road?
- On pages 4/5 are "exceptions to the LOS standard. 1, "The visual aesthetics of the required improvement and it impact to the community identity and character" 2. Environmental impacts include air quality and noise impacts" 3. The quality of life as perceived by residents."

5-7

5-8

5-9

5-10

5-11

Other Questions/Comments:

<ul style="list-style-type: none"><li>• Morgan Creek and Doyle Ranch ave only been here approximately 5 years - why didn't the County have the road extended to 6 lanes at that time - or at least allow for setbacks prior to construction? Then the H/O's would have known what they were getting into.</li><li>• All of the documents and proposed developments (such as Placer vineyards) show Walerga as a 4 lane road. At the MAC meeting they said that since the 1990 original plan Walerga was planned to be a 6 lane road.</li><li>• Note: Hwy 99 and 65 are only 4 lanes - why is Walerga supposed to be 6 lanes!! Hwy 80 is 6 lanes here, but is only 4 lanes most of the way to Reno. We do not understand why we need to expand to 6 lanes when freeways are not as big!</li><li>• It takes about 10-15 minutes to get to the 80 freeway from Morgan Creek if you take Walerga to Elkhorn. It is only 2-4 lanes most the way with lots of traffic signals. It is about 5 miles - which is certainly not a direct route to the freeway! Most people I have talked to say they use Foothills to Cirby or Baseline to Watt or Baseline to the 99 - not Walerga.</li><li>• I have lived next to Walerga for 2 years and have NEVER seen traffic backup - in fact it is a raceway!</li><li>• Rural area - what is your description?? Why is Cook Riolo and Vineyard "rural" and we are not? They are 2 minutes from us. We purchased this home 2 years ago to get away from the typical city life - like freeways, noise, pollution, etc. If I wanted to live behind a wall I would have moved to another less expensive community!!! We do not live in a community with commercial/retail businesses - we have a strawberry stand near us.</li></ul>	5-12
	5-13
	5-14
	5-15
<p>Livability is an important factor for all of us in MC and Doyle Ranch - the possibility of an ugly 6' wall with sidewalks and landscaping as only an option is certainly NOT what we expected when we bought our homes in this exclusive area!!</p>	5-16



**RESPONSE TO COMMENT LETTER 5**

**Response 5-1:** The Notice of Availability included the correct address of the Placer County Community Development Resource Agency three times, as well as the physical location of the building, the County's website, email addresses, and phone numbers of contact personnel. Because the address is listed correctly three times, the one clerical error regarding the address is not considered grounds for re-noticing of the Draft EIR. In addition, the Community Development Resource Agency building is the only building on County Center Drive. Persons wishing to comment on the Draft EIR could do so by providing written, electronic, or verbal comments in addition to speaking at the public hearing.

**Response 5-2: Section 5.3.3.1, Impact 5-1** regarding noise-related construction impacts associated with the proposed project requires implementation of Mitigation Measure 5-1a: Develop and Implement a Construction Noise Abatement Program Prior to Construction to reduce a potentially significant impact to a less-than-significant level. Please see pages 5-17 and 5-18 of the Draft EIR. Please also see Master Response 7.

**Response 5-3: Section 5.3.3.2, Impact 5-3** regarding noise-related operation impacts associated with the proposed project identifies a significant and unavoidable impact due to the anticipated noise increase on PFE Road, between Pinehurst and Cook-Riolo Road. See **Table 5-9** on page 5-21 of the Draft EIR. No other locations were identified as having a significant and unavoidable impact from the proposed project. The noise increase on Walerga Road associated with the proposed project is 0.8 decibel, which is not considered to be an impact. Please see pages 5-19 and 5-20 in the Draft EIR. Please also see Master Response 7.

**Response 5-4:** The Draft EIR analyzed the proposed project at a program level because this is the appropriate level of analysis for a plan, and because project-specific details will be determined once the plan is approved and funding is available for development of specific plan components. The purpose of updating the *Community Plan – Transportation Element* was to determine the roadway network necessary and adopt the appropriate LOS standards that will accommodate future cumulative buildout of the *Community Plan* area and surrounding areas. Please see Master Response 2 regarding impacts associated with the widening of Walerga Road. Please see Master Response 3 regarding issues related to the proposed Walerga Road Bridge Replacement Project.

**Response 5-5:** The Draft EIR analyzed the proposed project at a program level because this is the appropriate level of analysis for a plan, and because project-specific details will be determined once the plan is approved and funding is available for development of specific plan components. The widening of the existing four-lane section of Walerga Road to six lanes is not anticipated to be necessary for another 20 years. Please also see Master Response 2.

**Response 5-6:** As explained in **Section 6.1.2** on page 6-2 of the Draft EIR, roadways are classified or designated based on the linkages they provide and their intended function. Placer County's functional classification system for roadways recognizes differences in roadway functions and standards between urban/suburban areas and rural areas. Local streets provide direct access, and carry low traffic volumes at slow vehicular speeds. Examples of local streets are Tapaderas Loop, Watersone Drive, Pinehurst Drive, and Central Avenue. Collector roadways are intended to collect traffic from local streets and deliver that traffic to higher traffic roadways (e.g., arterial roadways). Collector roadways typically provide limited access, and carry moderate traffic volumes at moderate vehicular speeds. Examples of collector roadways are Cook-Riolo Road, Vineyard Road, and PFE Road. Arterial roadways provide connectivity with a given region. Arterial roadways serve to connect higher volumes of traffic with other arterial roadways or the state highway system. Arterial roadways provide limited access, and carry higher traffic volumes and higher vehicular speeds. Examples of arterial roadways are Walerga Road, Baseline Road, and Watt

Avenue. In order for a transportation system to function properly and safely, all three types of roadways need to be developed and maintained. Some roadways must carry higher volumes of traffic than others within a given area. Please also see Master Response 2.

**Response 5-7:** Please see Master Response 4.

**Response 5-8:** Roadway safety of the public is of utmost concern to Placer County. The expected increase in traffic, which would create a traffic safety hazard for school buses, bicyclist, and pedestrians, is the primary reason for the proposed project. The widening of Walerga Road to six lanes under the proposed project would provide adequate space for the expected traffic, while retaining existing bike/pedestrian lanes. It is the County's practice to require that the construction contractor prepare a traffic control plan, to be approved by Placer County Department of Public Works, prior to initiation of any roadway projects in Placer County. Since this is a programmatic-level Draft EIR, safety issues along Walerga Road will be addressed when project-specific details are developed. Please also see Response to Comment 15-28.

**Response 5-9:** Please see Master Response 5.

**Response 5-10:** The Draft EIR analyzed the proposed project at a program level because this is the appropriate level of analysis for a plan, and because project-specific details will be determined once the plan is approved and funding is available for development of specific plan components. Detailed design of the plan components, at a later date, would include measures to address impacts on agricultural lands, natural resources, and historic sites, if necessary.

As stated on page 3-11 of the Draft EIR, "The objective of the *Community Plan – Transportation Element* update is to improve traffic circulation within the *Community Plan* area while at the same time preserving its rural character." In order to accomplish this objective, some roadways will need to be expanded to account for the effects of the proposed and approved developments that are anticipated in the *Community Plan* area and adjacent jurisdictions, and the associated traffic that is generated by them.

Walerga Road is designated as an arterial roadway according to Placer County's functional classification system. Arterial roadways serve to connect higher volumes of traffic with other arterial roadways or the state highway system. Arterial roadways provide limited access, and carry higher traffic volumes and higher vehicular speeds.

**Response 5-11:** Pages 4 and 5 of the *Update to the Dry Creek/West Placer Community Plan – Draft Transportation Element* outline the considerations the County must review when roadway improvements are identified to maintain the LOS standards in the *Community Plan* area. Aesthetic impacts of the proposed project were evaluated in the December 2007 NOP/IS. Air quality and noise impacts were evaluated in **Chapters 4** and **5** in the Draft EIR. Quality of life concerns were evaluated in both the December 2007 NOP/IS and **Chapters 4, 5, and 6** of the Draft EIR.

**Response 5-12:** Please see Master Response 6.

**Response 5-13:** Comment noted.

**Response 5-14:** Comment noted. The *Community Plan – Transportation Element* is being updated to accommodate future traffic, which is projected to increase as newly entitled projects are built out. Please also see Master Response 6 regarding projected future traffic.

**Response 5-15:** This comment does not raise an issue with the Draft EIR. The County's Zoning Codes formal definition of "rural" relates to zoning and allowable uses but does not provide physical features. From Placer County's perspective, rural areas within County are typically considered to have narrow roadways with narrow shoulders, drainage ditches along the edge of the road, no curbs, gutters or sidewalks, larger size lots, unpaved or gravel driveways, out buildings on the property, and may have horses or other livestock. While much of the *Community Plan* area is considered by both the County and the residents to be "rural," the design and features of the Morgan Creek and Doyle Ranch subdivisions are considered more suburban than rural.

Cook-Riolo Road and Vineyard Road are designated as rural highways. As defined in Table I-6: General Roadway Standards by Functional Class in the Placer County General Plan, rural highways have no restrictions regarding driveway access, and are designed to accommodate up to 8,000 vehicles per day with two lanes. Rural highways often have narrow shoulders and are in rolling terrain areas. Rural highways serve to connect local residents to other major roadways, such as arterial roadways.

Walerga Road is designated as an arterial roadway. As defined in Table I-6: General Roadway Standards by Functional Class in the Placer County General Plan, arterial roadways have limited driveway access (i.e., non-residential), and are designed to accommodate up to 24,000 vehicles per day with either two or four lanes. Arterial roadways often have wide shoulders and are on level or gently slopping terrain. Arterial roadways provide connectivity with a given region. Arterial roadways serve to connect higher volumes of traffic with other arterial roadways or the state highway system.

**Response 5-16:** The Doyle Ranch subdivision currently has a wall/fence between the homes and Walerga Road. The Morgan Creek subdivision currently has a low-rise earthen berm between the homes and Walerga Road. The Draft EIR analyzed the proposed project at a program level because this is the appropriate level of analysis for a plan, and because project-specific details will be determined once the plan is approved and funding is available for development of specific plan components. During the design process, Placer County would ensure that the proposed widening of Walerga Road to six lanes would include all industry standard safety measures to protect homes that are immediately adjacent to Walerga Road. Where feasible, aesthetics would be addressed to ensure the character of the affected area is not significantly altered. Please also see Master Response 2, which provides information on potential configurations related to widening of Walerga Road.

The existing wall/fence and low-rise earthen berm act as a sound wall that deflects some roadway-related noise away from homes. These features were required specifically as sound mitigation for Walerga Road noise. During construction of Walerga Road to six lanes, the use of Open Graded Asphalt Concrete (OGAC) pavement during road widening or repaving projects could reduce traffic noise levels. As stated on page 5-20 of the Draft EIR, OGAC "has been shown to provide a long-term 3- to 5-dB [decibel] reduction in noise levels."

**From:** Nancy Boris  
**To:** Placer County Environmental Coordination Services;  
**Subject:** Walerga Rd, Roseville  
**Date:** Wednesday, June 16, 2010 9:11:57 PM

---

I own a house in Morgan Creek. I am writing to voice my opinion objecting to the widening of the road on Walerga between PFE and Baseline!

What do I have to do to STOP this expansion? I STRONGLY OBJECT to the road being widened!

Nancy Boris  
8621 French Creek Court  
Roseville, CA 95747  
916 580 8389

**From:** Phillip Vassion  
**To:** Maywan Krach;  
**Subject:** FW: Dry Creek Community Plan Transportation Element Update  
**Date:** Thursday, June 17, 2010 8:07:56 AM

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**From:** Nancy Boris [mailto:colleen20051047@yahoo.com]  
**Sent:** Wednesday, June 16, 2010 9:20 PM  
**To:** Phillip Vassion  
**Subject:** Re: Dry Creek Community Plan Transportation Element Update

I strongly object to the widening of Walgera Rd between PFE and Baseline.

| 6-2

Why does the article state the address as being 3901 County Center Drive when your letterhead reports 3091? Are you attempting to mislead the public? Thank you, Nancy Boris

| 6-3

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**From:** Phillip Vassion <PVassion@placer.ca.gov>  
**To:** "colleen20051047@yahoo.com" <colleen20051047@yahoo.com>  
**Sent:** Wed, June 16, 2010 3:42:02 PM  
**Subject:** Dry Creek Community Plan Transportation Element Update

Colleen,

I have attached the Notice of Availability which includes the physical address of where to send comments to.

Also, here is the link to get to the Environmental Impact Report and other related documents.

<http://www.placer.ca.gov/Departments/CommunityDevelopment/EnvCoordSvcs/EIR/DryCreekTransportation.aspx>

Simply put, when full build-out of the Community Plan occurs within the next 20 to 30 years, Walerga Road will not be able to handle the volume of traffic that will exist at that time, and that is why we are proposing to widen it out to 6 lanes. The noise that will be created due to this will be mitigated with noise walls that will reduce the noise to pre-project levels. Let me know if you have any other questions,



Respectfully,

*Phil Vassion, P.E.  
Associate Civil Engineer  
Placer County DPW  
3091 County Center Drive  
Auburn, CA 95603  
(530) 745-7581  
(530) 745-3567 (fax)  
pvassion@placer.ca.gov*



## RESPONSE TO COMMENT LETTER 6

**Response 6-1:** The commenter's opposition to widening of Walerga Road is noted. Please see Master Response 6 for the reasoning behind the County's proposed project.

**Response 6-2:** The commenter's opposition to widening of Walerga Road is noted. Please see Master Response 6 for the reasoning behind the County's proposed project.

**Response 6-3:** Please see Response to Comment 5-1.

**From:** Dave Forkum  
**To:** Placer County Environmental Coordination Services;  
**cc:** jcervantes@roseville.ca.us; Joanne Forkum;  
**Subject:** Transportation Element - Update to Dry Creek / West Placer Community Plan  
**Date:** Wednesday, June 16, 2010 2:27:34 PM

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Greetings

I am a resident on Faulkner Drive and have major issues with pages 26 - 28 of the subject community plan. My main concern is with the narrative relating to the removal of the restriction at the Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard Intersection. This part of the proposal only mentions the control of commute traffic and driving times by routing travel on other Community Plan area roadways. The two options basically only mention the same two alternatives.

7-1

No where do I see any information in the plan that addresses the critical safety problems that exist due to the re-routing of traffic down the residential streets of Faulkner and Caswell. All of the traffic that would normally go from Woodcreek Oaks across Baseline onto Cook Riolo and vice versa travels at high speed and often without stopping at stop signs down these residential streets. These two streets have many small children that can't even play out in their front yards or sidewalks due to the fear of speeding traffic. I have witnessed many times, speeding traffic coming off of Caswell to Faulkner and riding up over the sidewalk and the edge of a residence lawn. All of the other residents on these two streets can testify to the critical safety condition as well.

7-2

This is totally unacceptable!!! What is wrong with the city planning management and city council members? It appears that they are much more concerned with control of commute traffic and driving times than they are of the safety and well being of the families that live on these two streets. The mentioned plan proves that! No doubt, traffic control is very important but not as important as the safety of Roseville's residents.

7-3

Any solutions that come out of this plan must consider the safety of the families that live on these two streets first, not last!

Sincerely

Dave Forkum

1575 Faulkner Drive  
791-5503

## RESPONSE TO COMMENT LETTER 7

**Response 7-1:** The commenter states that pages 26 through 28 of the *Update to the Dry Creek/West Placer Community Plan – Draft Transportation Element* mention “only the control of commute traffic and driving times by routing travel on other Community Plan area roadways. The two options basically only mention the same two alternatives.” Placer County disagrees with this statement. Option 1, as described on page 26, includes the removal of the existing Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection traffic diverter. Option 2, as described on page 28, includes keeping the existing Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection traffic diverter. The two options are different for the reasons described.

**Response 7-2:** Please see Response to Comment 1-2 regarding traffic concerns on Faulkner and Caswell drives. The Draft EIR does discuss leaving the traffic diverter in place (the No Project Alternative and Alternative 5, as discussed in **Chapter 7** of the Draft EIR), as well as removing it (the proposed project and all other alternatives discussed in **Chapter 7**), along with consideration of the implications of either action. The decision to remove or leave the traffic diverter in place will be made by the Placer County Board of Supervisors.

**Response 7-3:** Please see Response to Comment 1-2.

**From:** tazzy@surewest.net  
**To:** Placer County Environmental Coordination Services;  
**Subject:** Cook Riolo/Woodcreek Oaks/Baseline Intersection  
**Date:** Wednesday, June 23, 2010 2:36:52 PM

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Dear Maywan Krach,

I understand that a public hearing has been scheduled in Auburn on July 23, 2010 regarding the removal of the through-movement traffic restriction on Baseline road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection. I would like to take this opportunity to express my feelings and comment on this subject.

I live on 1016 Caswell Dr which is one of the residential city streets that is impacted from having the through-movement traffic restriction in place.

I recommend having this restriction removed for the reasons listed:

1. Safety

When school is in session the traffic increases on Caswell Drive at least 300%. During the morning and afternoon hours the drivers speed through over the posted 25 MPH speed limit heading to and returning from Woodcreek High School.

2. Reduce ADT (average daily traffic)

Eliminate the need for school buses, fire trucks, and other non resident traffic from using the residential streets.

3. Reduce wear and tear on the travel way, noise and air pollution

By removing the through-movement traffic restriction will keep the through-movement traffic on the streets that were designed for that. Would eliminate through traffic from having to stop at three stop signs. Would improve traffic flow thus reducing air and noise pollution on local residential streets. Would also cut back on travel time and improve fuel mileage.

The intersection is already a controlled signalized intersection. There would be no need to have to run new conduits for electrical service. The layout of the intersection would have to be modified to include Left, and Right turn pockets as well as a through lane.

I often wonder why the traffic restriction wasn't permanently removed when it was removed for the highway sand seal that was placed on Woodcreek Oaks Blvd. a few years ago.

Thank you for the opportunity to comment on this subject. Please keep me informed of the status of the traffic restriction.

Peter C. Azevedo

## **RESPONSE TO COMMENT LETTER 8**

**Response 8-1:** Please see Response to Comment 1-2.



**From:** Bob Friend  
**To:** Placer County Environmental Coordination Services;  
**cc:** [aaronjohnsonemail@yahoo.com](mailto:aaronjohnsonemail@yahoo.com);  
**Subject:** Intersection Cook Riolo/Woodcreek Oaks/Baseline  
**Date:** Wednesday, June 23, 2010 8:33:59 AM

---

Attn: Maywan Krach

I understand that Placer County is paying some attention to this intersection. I understand the original thought for its need but we have progressed well past that issue. You show an option to remove it in your projected plan and that makes all good sense to me and our neighborhood. "Traffic" is using Faulkner Drive/Caswell Drive to maneuver around that restriction to access Cook Riolo/Woodcreek Oaks. This means a lot of unneeded & unwanted traffic in our neighborhood. They are also making U turns on Baseline to continue their travels. Due to growth and school traffic Cook Riolo is no longer a rural road. If you & the residents want that, remove the pavement and go back to gravel. A concerned resident of Placer County,

Robert/Linda Friend



## **RESPONSE TO COMMENT LETTER 9**

**Response 9-1:** Please see Response to Comment 1-2.

**From:** Orlando Reyes  
**To:** Placer County Environmental Coordination Services;  
**Subject:** PEIR T20070805-WALERGA ROAD WIDENING  
**Date:** Wednesday, June 23, 2010 4:14:58 PM

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I am writing to express my objection to the Dry Creek/West Placer Community Plan – Transportation Element (PEIR T20070805/State Clearinghouse # 2007122051)

I find the proposed addition of two lanes totally unacceptable for the following reasons:

- |   |      |
|---|------|
| 1. It is not obvious that a capacity expansion is needed.   | 10-1 |
| 2. Assuming that the demand will be there, eventually it will only create a bottle neck at the end of the three lane segment.             | 10-2 |
| 3. It will destroy the beautiful oak trees along the construction path.   | 10-3 |
| 4. It will increase the noise to people leaving close by.   | 10-4 |
| 5. Given the many higher priority projects/areas in CA; why are we spending close to a \$100,000,000.00 in a project that is not needed!! | 10-5 |

I beg you to spend our money wisely!!

PLEASE STOP THIS PROJECT.

Orlando Reyes  
 8900 Belford Ct.  
 Roseville, CA 95747

## RESPONSE TO COMMENT LETTER 10

**Response 10-1:** Please see Master Responses 2 and 6.

**Response 10-2:** Please see Master Response 5.

**Response 10-3:** The Draft EIR analyzed the proposed project at a program level because this is the appropriate level of analysis for a plan, and because project-specific details will be determined once the plan is approved and funding is available for development of specific plan components. Please see Master Response 2 regarding potential removal of existing trees when Walerga Road is widened to six lanes.

**Response 10-4: Table 5-9** on page 5-21 of the Draft EIR outlines the anticipated noise levels associated with the No Project Alternative and the proposed project. Only one significant and unavoidable noise impact associated with the proposed project was identified – the anticipated noise increase on PFE Road between Pinehurst and Cook-Riolo Road. No other locations were identified as having a significant and unavoidable noise impact as a result of the proposed project.

**Response 10-5:** This comment does not raise an issue with the Draft EIR. The intent of the update to the *Community Plan – Transportation Element* is to identify a roadway network capable of handling the projected traffic volumes from growth in the surrounding area. Once the *Transportation Element* and associated roadway network are adopted, the County will modify the Capital Improvement Program for the *Community Plan* area to reflect the improvements necessary, and implement the appropriate traffic fees to pay for the roadway improvements. Because the Traffic Impact Fee Program is nexus-based, as developers build they have an obligation to either build improvements to mitigate their projects' impacts or pay the impact fees. The traffic impact fees can only be used on the roadway projects within the adopted fee program.

In addition, the County has been successful in negotiating with developers within the City of Roseville that they pay fees to Placer County representing their projects fair share of impacts to County roadways. Additional information about the Countywide Traffic Impact Fee program can be found at both the Department of Public Works or at Placer County's website under Department of Public Works.

**From:** Sean  
**To:** Placer County Environmental Coordination Services;  
**Subject:** Remove the Porkchop!  
**Date:** Wednesday, June 23, 2010 5:12:37 PM

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Hello,

I'm writing to chime in on the upcoming public hearing occurring on July 23rd, 2010 regarding the community plan.

The "pork chop" obstructing the intersection of Baseline Rd. - Cook-Reilo - Woodcreek Oaks needs to go. My wife and I bought a great house here in Roseville back in 2006 to enjoy this great city/county. We moved from a house in the North Bay that was on a busy street, and we feared for the safety of our children. We thought that things were going to be much better, living on a court. WRONG! At many time during the day, it is simply unsafe for our kids to be in the street. Drivers looking to drive through Woodcreek to Cook-Reilo and vice-versa are constantly using Caswell Drive/Faulkner as a way around. Traffic is regularly heavy, consisting of single drivers, large trucks, and of course ALL CITY & COUNTY vehicles. Drivers regularly violate the speed limit, and almost never stop at the stop sign. There have been two auto accidents here in the last 18 months resulting from drivers traveling at a high rate of speed. Both resulted in property damage, and both drivers were using our street to drive around the pork chop obstruction.

With the new school on Cook-Reilo, and an ever increasing pressure from new motorist, it's time to stop the madness now.

Sean Young  
208 Caswell Ct  
Roseville, CA 95747  
syoun@knightskyconsulting.net  
916.960.7491

11-1

## **RESPONSE TO COMMENT LETTER 11**

**Response 11-1:** Please see Response to Comment 1-2.

**From:** [RJNR@comcast.net](mailto:RJNR@comcast.net)  
**To:** [Placer County Environmental Coordination Services;](#)  
**Subject:** Baseline/Cook Riolo median  
**Date:** Thursday, June 24, 2010 5:49:13 PM

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Hello. I think it is long overdue,getting that barrier out! Commute traffic speeds up & down Caswell Dr Mon-Fri. Then on weekend nights, people going home from parties,bars,restaurants do the same thing (sometimes with very loud vehicles). Some people simply drive around that barrier if they see no Police. Others make illegal u-turns at Baseline/Caswell, or on Baseline between Caswell & Woodcreek Oaks!!

Thanks, Raj D

12-1

## **RESPONSE TO COMMENT LETTER 12**

**Response 12-1:** Please see Response to Comment 1-2.



RECEIVED

JUN 28 2010

ENVIRONMENTAL COORDINATION SERVICES

MAYWAN KRACH  
PLACER COUNTY CENTER DRIVE SUITE 190  
AUBURN, CALIFORNIA 95603

SUBJECT REMOVE BASELINE/ COOK RIOLO WOODCREEK OAKS  
INTERSECTION RESTRICTIOON.

MY NAME IS HELEN SILVERIA AND I LIVE AT 1582 FAULKNER DR.

I PURCHASED THIS HOME IN MAY OF 99. EVEN DURING CONSTRUCTION  
THE TRAFFIC WAS HORENDOUIS. ELLIOTT HOMES BUILDING FORMA N  
WARNED ME ABOUT THIS PROBLEM WHEN I MOVED IN AND IT HAS ONLY  
GOTTEN WORSE.

I, THEREFOR OPT FOR THE REMOVAL OF THIS RESTRICTION AS SOON AS  
POSSIBLE.

SINCERELY

HELEN SILVERIA  
1582 FAULKNER DR.  
ROSEVILLE, CALIFORNIA

*Helen E Silveria*  
*6/24/10*

13-1

## **RESPONSE TO COMMENT LETTER 13**

**Response 13-1:** Please see Response to Comment 1-2.

SEAN MITCHELL

RECEIVED

JUL 06 2010

July 3, 2010

ENVIRONMENTAL COORDINATION SERVICES

Placer County Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

Attn: Maywan Krach

Dear Ms. Krach:

I am resident in the Elliott Homes subdivision just northeast of the intersection of Woodcreek Oaks and Baseline Road. I am writing to you to express my thoughts about the "through-movement restriction" at this intersection (commonly known as "the porkchop").

As designed, my small subdivision of 76 homes should encourage only the traffic of those who live here, their guests, and the occasional lost motorist or delivery driver. As designed, you would not normally think of it as being used for pass-thru traffic. However, the placement of this device diverts and confuses drivers, resulting in their taking drastic and erratic measures to get where they want to go. At the intersection itself, drivers simply drive around the diversion. Others make unsafe u-turns near the intersection, or in the area of Baseline Road and Caswell Drive. (Most residents in my neighborhood can describe having near-misses with drivers making such maneuvers at this intersection). Closer to home, in my tract, it results in drivers that speed, run the stop sign, drive on the wrong side of the road and get lost in the cul-de-sacs.

I have reviewed all of the speed surveys and traffic collision studies for my neighborhood. I am fully aware that the 85<sup>th</sup> percentile for speeding is not overwhelming or shocking. But the city has also reported that 50-60% of traffic flowing through my neighborhood during the morning and evening commutes is pass-thru, and has no business in this neighborhood. This diversion brings unnecessary and unwanted noise, traffic, and problems to a neighborhood that should not have to contend with it.

14-1

14-2

July 3, 2010

Conversely, it was folly for any of the residents along Cook-Riolo Road to have ever assumed that this road would ever remain a quiet, bucolic little country road forever. They have long lived along a pass-thru road, one that would naturally develop over time. The time has come for them to acknowledge their growth, and to take the steps necessary to promote a more orderly flow of increasing traffic through their neighborhood.

14-3

Lastly, I would mention that I have 23 years in traffic management as a state law enforcement officer. The collision and speed surveys do not tell the complete story for traffic in my neighborhood. The city has explained that the roadways in my neighborhood are designed to handle this volume of traffic, but that is not the point. The residents had no reason to expect this volume of traffic when selecting their homes, and should not have to tolerate the excesses of commute traffic due to an ill-advised "band-aid" traffic diversion plan.

14-4

Times have changed. The county areas south of Baseline Road have developed and will continue to do so. It is time to properly re-configure this intersection. It is time to remove the "porkchop."

Sincerely,

A handwritten signature in black ink, appearing to read "Sean Mitchell", with a long horizontal flourish extending to the right.

Sean Mitchell

325 HADNALL CT. • ROSEVILLE, CA • 95747  
PHONE: (916) 771-4725

## **RESPONSE TO COMMENT LETTER 14**

**Response 14-1:** Please see Response to Comment 1-2.

**Response 14-2:** Please see Response to Comment 1-2.

**Response 14-3:** Comment noted.

**Response 14-4:** Please see Response to Comment 1-2.



Hi,

Could you please help me? The Dry Creek/West Placer Community Plan notice that was mailed to me says that the hearing will be in the Placer County Planning Commission Hearing Room at 3901 County Center Drive and then later says the document is available for review in the Placer county Community Development Resource Agency, 3091 County Center Drive, Auburn, CA.

I found this on the website:

The CDRA will focus on continued improvement in the permit and application review processes, coordination among all County land-use departments and divisions, and overall customer service. Offices are located at 3091 County Center Drive, at the corner of Bell Road and Richardson Drive in the north Auburn area.

So are these two different departments? Where exactly is the hearing taking place on 7/22? I am unable to locate the address of 3901 County Center Drive.

Thank You,  
Carol Flinn

I

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--- On **Fri, 7/23/10**, carol flinn <cfsac@yahoo.com> wrote:

From: carol flinn <cfsac@yahoo.com>  
Subject: Supplemental DEIR Hearing Letter  
To: cdraecs@placer.ca.gov  
Cc: "Carol Flinn" <cfsac@yahoo.com>, "Tim Sweeney" <stardog2x@yahoo.com>, "Tamie Houser" <tamiehouser@yahoo.com>  
Date: Friday, July 23, 2010, 4:31 PM

Attached is a Supplemental 7/22 DEIR Hearing Letter.

Thank you,

Carol Flinn  
DROA Board President

**From:** [carol flinn](#)  
**To:** [Placer County Environmental Coordination Services](#);  
**cc:** [Carol Flinn](#); [Tamie Houser](#); [Tim Sweeney](#);  
**Subject:** Fw: Supplemental DEIR Hearing Letter  
**Date:** Friday, July 23, 2010 9:56:06 PM  
**Attachments:** [Scan 7-23 Supplemental Letter.pdf](#)

---

The email below is the attachment to the above submitted supplemental comments.

Thank You

Yahoo! Mail

## RE: Dry Creek/West Placer 7/22 EIR HEARING

Tuesday, July 6, 2010 10:32 AM

**From:** "Maywan Krach" <MKrach@placer.ca.gov>  
**To:** "carol flinn" <cfsac@yahoo.com>  
**Cc:** "Jeff Devon" <jeff.devon@yahoo.com>, "Maria Wong" <wongmb@aol.com>

The correct address is "3091". There is only one building on this new street called "County Center Drive". We apologize for the misprint. The hearing room is located on the first floor of the building, and there's a receptionist desk in case you have further questions.

Thanks.

.....  
Maywan Krach

Community Development Technician

Environmental Coordination Services

Placer County Community Development Resource Agency

3091 County Center Drive, Suite 190, Auburn, CA 95603

530-745-3132 fax 530-745-3003

8am-5pm, Mon-Fri  
.....

---

**From:** carol flinn [mailto:[cfsac@yahoo.com](mailto:cfsac@yahoo.com)]  
**Sent:** Sunday, July 04, 2010 11:34 PM  
**To:** Placer County Environmental Coordination Services  
**Cc:** Carol Flinn; Jeff Devon; Maria Wong  
**Subject:** Fw: Dry Creek/West Placer 7/22 EIR HEARING



YAHOO! MAIL

RE: Dry Creek/West Placer 7/22 EIR HEARING

Tuesday, July 6, 2010 10:32 AM

From: "Maywan Krach" <MKrach@placer.ca.gov>

To: "carol flinn" <cfsac@yahoo.com>

Cc: "Jeff Devon" <jeff.devon@yahoo.com>, "Maria Wong" <wongmb@aol.com>

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Thanks.

Maywan Krach  
Community Development Technician  
Environmental Coordination Services  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 190, Auburn, CA 95603  
530-745-3132 fax 530-745-3003  
8am-5pm, Mon-Fri

**From:** carol flinn [mailto:cfsac@yahoo.com]  
**Sent:** Sunday, July 04, 2010 11:34 PM  
**To:** Placer County Environmental Coordination Services  
**Cc:** Carol Flinn; Jeff Devon; Maria Wong  
**Subject:** Fw: Dry Creek/West Placer 7/22 EIR HEARING

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Thank You,

Carol Flinn

<http://us.mc526.mail.yahoo.com/mc/showMessage?sMid=0&fid=...> 7/14/2010



**COUNTY OF PLACER**  
**Community Development Resource Agency**

ENVIRONMENTAL COORDINATION  
SERVICES

Michael J. Johnson, AICP  
Agency Director

**NOTICE OF AVAILABILITY  
OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR PUBLIC REVIEW**

Placer County has released a Draft Environmental Impact Report (EIR) for the project listed below:

**PROPOSED PROJECT:** Dry Creek/West Placer Community Plan – Transportation Element Update  
(PEIR T20070805/State Clearinghouse #2007122051)

**PROJECT DESCRIPTION:** The proposed project is an update to the Dry Creek/West Placer Community Plan – Transportation Element to revise the transportation goals and policies for relevance to today's community environment and to ensure applicability in the future. The main objective of the proposed project is to help identify the appropriate level of service (LOS) standard that would accommodate future development within the Community Plan area. Additionally, as a part of the Community Plan – Transportation Element update, the County proposes the following roadway circulation system changes: keep PFE Road open (the current Community Plan currently calls for closure of PFE Road at Cook-Riolo Road upon reaching certain traffic thresholds); control the speed limit by constructing speed reduction treatments on PFE Road and Cook-Riolo Road in order to preserve the rural character of the Community Plan area, and keep regional traffic from using these roadways as cut-through routes; widen selected Community Plan area roadways (Watt Avenue, Walerga Road, and PFE Road); and remove the Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection restriction.

**PROJECT LOCATION:** The project site(s) are located in western Placer County, near the PFE Road and Cook-Riolo Road intersection. The City of Roseville is located to the east. (see map)

**REVIEW PERIOD:** June 9, 2010 to July 23, 2010

**PUBLIC HEARING:** A public hearing to receive comments on the subject Draft EIR will be held during the review period in the Placer County Planning Commission Hearing Room at 3091 County Center Drive (corner of Richardson Drive and Bell Road in the Dewitt Center) in Auburn on Thursday, July 22, 2010, at 10:05 am. The purpose of this hearing is to discuss the subject Draft EIR. Comments received during the comment period and at the public hearing will be addressed in a Final EIR.

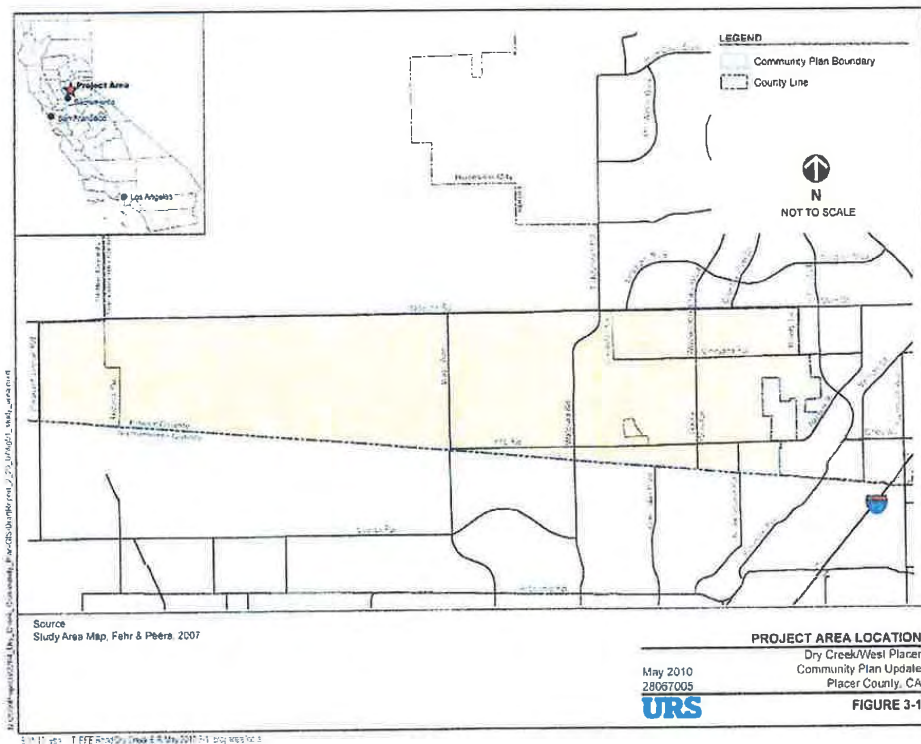
**SIGNIFICANT ENVIRONMENTAL EFFECTS ANTICIPATED:** The subject Draft EIR identified significant or potentially significant impacts regarding air quality, noise, and traffic/transportation. With implementation of the recommended mitigation measures detailed in the Draft EIR, all impacts are reduced to less-than-significant levels except for the identified traffic/transportation impacts in the City of Roseville and Sacramento County which would remain potentially significant.

**COMMENTS:** Comments on the subject Draft EIR can be sent to Maywan Krach, Placer County Community Development Resource Agency, 3091 County Center Drive, Suite 190, Auburn, California 95603 or [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov) by 5:00 pm, July 23, 2010. The subject Draft EIR is available for public review at the following locations:

- Placer County Community Development Resource Agency, 3091 County Center Drive, Auburn, California
- Auburn Public Library, 350 Nevada Street, Auburn, California
- Roseville Public Library, 225 Taylor Street, Roseville, California
- County web site:  
<http://www.placer.ca.gov/Departments/CommunityDevelopment/EnvCoordSvcs/EIR/DryCreekTransportation.aspx>

Comments regarding the adequacy of the subject Draft EIR not presented during the review period may not be considered at subsequent hearings. Additional information may be obtained by contacting the Placer County Community Development Resource Agency at (530)745-3132 between the hours of 8:00 am and 5:00 pm. (County offices are closed on Friday, June 18, 2010 for furlough.)

Published in Sacramento Bee on Wednesday, June 9, 2010





# DOYLE RANCH OWNERS ASSOCIATION

c/o Massingham & Associates Management, Inc.  
6060 Sunrise Vista Drive, Suite 2440  
Citrus Heights, CA 95610

July 21, 2010

Placer County Planning Commission  
3091 County Center Drive, Suite 190  
Auburn, California 95603

RECEIVED

JUL 22 2010

CDRA

**Regarding: Letter of Comment— Dry Creek/West Placer Community Plan  
Transportation Element Update Draft Programmatic Environmental Impact  
Report (SCH # 2007122051)**

Chairman Brentnall and Commissioners:

The Doyle Ranch Owners Association ("DROA") appreciates the opportunity to provide comments on proposed amendments to the Dry Creek/West Placer Community Plan ("Community Plan") and the Draft Environmental Impact Report ("DEIR") referenced above. Doyle Ranch is located within the Community Plan area on the west side of Walerga Road between PFE Road and Baseline Road. The development is comprised of 126 residential lots, open space and a public park. Comments outlined below address proposed amendments to the Community Plan and the DEIR.

## GENERAL COMMENTS

The DROA and residents of Doyle Ranch are concerned that proposed Community Plan amendments will not achieve the goals of the Community Plan and instead will result in short term gains at the expense of current and future residents. The proposed Community Plan appears to benefit on certain neighborhoods (in the form of reduced traffic impacts) at the expense of other Community Plan residents (those living on the three roadways that will be widened to six lanes.) This is an inequitable solution to an area-wide problem. Residents of Doyle Ranch are already affected by speeding and cut through traffic from Walerga Road, a well documented problem that we have been working with county staff to resolve for over three years. Increasing traffic on Walerga Road will only exacerbate the problem.

15-2

Based on the comments that follow, we request that the county revise and recirculate the DEIR pursuant to CEQA Guidelines §15088.5 which says "an EIR which has been made available for public review, but not yet certified, must be recirculated whenever significant new information has been added to the EIR."

15-3

## SPECIFIC COMMENTS

### Community Plan Amendment

The DROA is opposed to proposed amendments to Transportation/Circulation Policies 6 and 9.

15-4

Proposed amendments to Policy 6 reduces the Walerga Road right of way from 144 to 106 feet. Within this width the county proposes to construct six travel lanes, turn lanes, medians, sidewalks and landscaping, but specifically allows the county to modify the right of way standard "at their discretion" to exclude landscaping, sidewalks, and other roadway appurtenances from the right of way. The amended policy does not describe criteria that will be used to determine which of these features would be eliminated, nor does it describe how public input would be incorporated into the decision. DORA is opposed to this amendment and requests that the proposed language be revised to require transparency and to allow for public input into the decision process.

15-5

We object to the proposed amendment to Policy 9 on similar grounds. Amended Policy 9 empowers the county to allow exceptions to proposed LOS standards "where it finds that the improvements or other measures required to achieve the LOS standard are unacceptable based on "established criteria" but fails to describe the criteria. We request that the language in Policy 9 be revised to describe criteria that will be used to determine which improvements would be eliminated and to describe how public input will be incorporated into the decision process. We believe that any decision to remove these essential streetscape elements should be made by the community and not at the staff level.

15-6

#### CEQA

##### **Programmatic EIR: Adequate level of CEQA review.**

The DROA acknowledges the county's decision to prepare a programmatic EIR and agrees that a program EIR is an EIR which may be prepared "on a series of actions that can be characterized as one large project and are related either geographically, as logical parts in the chain of contemplated actions, or in connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program." (Guidelines, § 15168(a); see also *Natural Resources, supra*, 103 Cal.App.4th at p. 281.). However, all types of EIRs must cover the same content. (CEQA Guidelines, §§ 15120-15132) and the level of specificity of an EIR is determined by the nature of the project and the "rule of reason." (*Laurel Heights, supra*, 47 Cal.3d at p. 407.)

It is our understanding that the county proposes to rely on the program EIR as a first tier EIR, pursuant to CEQA Guidelines, § 15152, subd. (h)(3); the DEIR clearly anticipates later environmental review of specific projects (*Subsequent Conformity Review Process*, pg. 1-3). Tiering is appropriate when the sequence of EIRs is "from a general plan, policy, or program EIR to a . . . site-specific EIR". However, tiering "does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR" (CEQA Guidelines, § 15152, subd. (b).)

15-7

The Guidelines further provide that when the first tier EIR is used in connection with a large-scale project, "the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand" (CEQA Guidelines, § 15152, subd. (c).) Significant effects on the environment that were not adequately addressed in the first tier EIR would require a subsequent EIR (CEQA Guidelines, § 15152, subd. (f).)



The subject DEIR outlines project level changes described in greater detail than would be expected at the programmatic level. For example, physical changes resulting from the Project are limited to "within 100 feet of the centerline of existing roadways" and at existing intersections. A fair argument can be made that the subject DEIR analyzes project level actions and that little uncertainty exists as to the characteristics or location of those actions. Further, the DEIR fails to disclose subsequent discretionary actions (including CEQA) that will be required to complete the roadway widening on Walerga Road, Watt Avenue, and Baseline Road. For these reasons we assert the DEIR is both a "program EIR" for the County's adoption of the update to the Dry Creek/West Placer Community Plan – Transportation Element and a "project-level" EIR for the planned roadway improvements.

15-7

15-8

Finally, we disagree with conclusions reached in the Initial Study that defined the scope of the Focused DEIR. A lead agency is required to perform an initial study which is sufficient to determine whether a project might have a significant effect on the environment. (Guidelines, § 15063, subd. (a).) The initial study is the preliminary environmental analysis, and an initial study which omits material necessary to informed decisionmaking subverts the purposes of CEQA and is an abuse of discretion. (*Lighthouse Field Beach Rescue v. City of Santa Cruz*, *supra*, at p. 1202.) The original Initial Study was undertaken when the project consisted of a narrower set of actions than are analyzed in the DEIR (pg. 1-2). Subsequent to the Initial Study, the three roadway widening elements were added to the project description. Based only on updated biological and cultural resources assessments, it was determined that revised project impacts were no greater than those identified in the Initial Study. We disagree that the second assessment was adequate to support the conclusion that the revised project would have no significant impact, because it failed to identify new land use, noise, traffic, aesthetics, flood, and other impacts associated with the widening of the three roadways.

15-9

**The DEIR fails to describe a sufficient baseline.**

Omission of baseline assumptions in an EIR falls short of the requirement of a good faith effort at full disclosure (Cal. Code Regs., tit. 14, § 15151.) An EIR must contain a description of the physical setting existing at the time of the commencement of the project and must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project (CEQA Guidelines, § 15125, subd. (a) and *San Joaquin Raptor*, *supra*, 27 Cal.App.4th at pp. 722-723.) CEQA Guideline section 15125 further provides that the EIR must include a description of the physical environmental conditions in the vicinity of the project from both a local and regional perspective: "This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives."

15-10

The DEIR describes an inaccurate baseline that has the potential to mask the true significance of impacts. As a result, the DEIR fails to meet the legal standard of providing complete and accurate information to assess whether it adequately investigated and discussed the impacts of the project. In particular, the DEIR omits any discussion of the new bridge that will be required on Walerga Road at Dry Creek, relies on stale traffic counts, and omits existing homes along Walerga Road from the list of sensitive receptors for both the air quality and noise impact assessment. Moreover, the DEIR dismissively refers to the edges of existing roadways as "weedy patches" even though they support urban landscaping and native vegetation.



**The DEIR fails to apply a consistent project description.**

An EIR must contain an accurate, stable and consistent project description. (CEQA Guidelines, § 15124; see also *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199.) An accurate description is necessary for the intelligent evaluation of the potential environmental effects of a proposed action. (*Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal.App.3d 577, 592.) "CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process." (*Mira Monte Homeowners Assn. v. County of Ventura* (1985) 165 Cal.App.3d 357, 366.) The project description must contain sufficient specific information about the project to allow the public and reviewing agencies to evaluate and review its environmental impacts. A project description that omits integral components of the project may result in an EIR that fails to disclose the actual impacts of the project.

15-11

The DEIR fails to describe and analyze the effects of the "whole of the Project", meaning that "the whole of an action that has a potential for resulting in physical change to the environment, and is an activity that may be subject to several discretionary approvals by governmental agencies." In omitting the new Walerga Road bridge from the project description and intermittently omitting the Walerga Road widening from several of the impact analyses (human health, air quality, light and glare, and noise, the Project description is rendered unstable and misleading. The new Walerga Road bridge (SCH# 208102100) is a planned four lane bridge; however, Walerga Road is a planned six lane roadway. Because the Project description should include reasonably foreseeable activities that may become part of the project (i.e., the widening of the Walerga Road bridge to six lanes) the DEIR must be revised to address these activities (See *Laurel Heights*, *supra*, 47 Cal.3d at p. 396.)

In addition, the DEIR fails to accurately describe the purpose of the Project. The Community Plan already authorizes the buildout of Walerga Road to six lanes between PFE and Baseline Roads. What purpose then, does the proposed Community Plan amendment related to Walerga Road serve? In the absence of a clear EIR statement of purpose, a fair argument can be made that by amending the Community Plan to "widen Walerga Road from four lanes to six" adoption of the Final EIR would permit the construction of new traffic lanes, sidewalks and other facilities in the future without additional discretionary approvals and environmental review.

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As a consequence, the DEIR fails to adequately discuss all phases (planning, implementation and operation) of the Project. (CEQA Guidelines 15063(a)(1)). The Initial Study analyzed a smaller range of actions than the county proposes to approve under the DEIR. As outlined above, the Initial Study excluded impacts associated with the widening of Walerga Road. Consequently the DEIR failed to fully incorporate to properly analyze the impacts associated with the revised project.

15-13

**Conclusions presented in the DEIR are not reachable based on information in the record.**

CEQA requires that findings must be based on substantial evidence in the record and be sufficient to bridge the gap between the available evidence and the conclusions reached. An EIR must contain facts and analysis, and may not consist of the agency's bare conclusions or opinions. It must disclose the "analytic route" the agency used in reaching its conclusions. (*Al Larson*, *supra*, 18 Cal.App.4th at pp. 739-740.) "An EIR should be prepared with a sufficient

15-14



analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of the EIR is to be reviewed in light of what is reasonably feasible." (CEQA Guidelines, § 15151.)

The DEIR fails in several instances to meet this requirement. For example, the DEIR reaches conflicting conclusions related to water quality. Following a brief discussion on the effect of the project on anadromous fish in Dry Creek, the document concludes that degraded water quality has the potential to create significant adverse impacts to those species. However, in a separate discussion on water quality the DEIR relies on the Initial Study's conclusion, without further explanation, that the project will not result in impacts to water quality. Because the document lacks sufficient analytical detail in all but the focused impact discussions, reviewers are unable to reach independent conclusions based on evidence in the record to resolve these and other inconsistencies. In addition, potential impacts may have been improperly overlooked or minimized. Consequently, the DEIR must be reviewed for similar omissions in other analyses, revised and re-circulated.

15-14

#### **Cumulative Impacts.**

CEQA requires an Initial Study to determine whether any project impacts are "cumulatively considerable," which requires consideration of whether any "reasonably foreseeable indirect physical changes" could occur with implementation of the Project. The DEIR fails to properly analyze cumulative impacts associated with Air Quality. Additionally, the DEIR must specify all of the planning documents that are being used in the cumulative impacts analysis and to specify where those planning documents can be publicly viewed (Cal. Code Regs., tit. 14, § 15130, subd. (a)(1)(B)). As of the date of this letter the DROA has been unable to locate a copy of the Walerga Road Bridge Replacement Bridge Mitigated Negative Declaration.

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#### **DEIR improperly defers analysis and mitigation to the future.**

CEQA permits the Lead Agency to defer the specifics of mitigation where the local entity commits itself to mitigation and lists the alternatives to be considered, analyzed and possibly incorporated in the mitigation plan. However, an EIR is inadequate if the success or failure of mitigation efforts depend upon management plans that have not yet been formulated and have not been subject to analysis and review within the EIR. A study conducted after approval of a project diminishes the public's influence on decision making (Pub. Resources Code, § 21000 et seq.). Reliance on tentative plans for future mitigation after completion of the CEQA process also significantly undermines CEQA's goals of full disclosure and informed decision making. Guidelines section 15126.4, subdivision (a)(1)(B) specifies as follows: "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." In *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307 [248 Cal. Rptr. 352] the court held that formulating specific mitigation measures outside of the public process fails to adequately inform the public and decision makers, prior to project approval, of the nature and efficacy of the proposed mitigation measures that will be undertaken. (See *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307 [248 Cal. Rptr. 352].) CEQA requires an EIR to identify and examine the full range of mitigation measures. (*League for Protection of Oakland's etc. Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896, 909 (*City of Oakland*).) The Guidelines provide that where several mitigation measures are available, the basis for selecting a

15-17



particular measure must be discussed in the EIR. (CEQA Guidelines, § 15126.4.) Mitigation may not be deferred unless clear performance standards are set forth in the EIR. (*Fairview Neighbors, supra*, 70 Cal.App.4th at p. 244; *Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1030.) Finally, mitigation measures must be enforceable. (*Lincoln Place Tenants Assn. v. City of Los Angeles* (2007) 155 Cal.App.4th 425, 445.)

The DEIR fails to meet the aforementioned CEQA test for all but a few of the recommended mitigation measures. Most of the recommended mitigation measures are inadequate because (1) they are not fully enforceable, (2) there is no substantial evidence that the measures are feasible or effective, (3) impacts associated with the implementation of the measures themselves were not analyzed in the EIR, and (4) mitigation measures outlined in the EIR improperly defer formulation of specific mitigation strategies until after Project approval. For example, impacts to biological resources relies on future reports that *may* be undertaken and compliance with recommendations that *may* be made in the report to mitigate impacts. Because the DEIR mitigation measures allow for *future* formulation of mitigation measures the DEIR impermissibly *defers* the development of important mitigation measures until after Project approval. Therefore, the recommended mitigation measures are insufficient to reduce impacts to a level of insignificance. Moreover, the DEIR lays out several versions of mitigation measures that presumably address identical impacts. In particular, Table 2-2 truncates more detailed mitigation measures for reasons that are not fully explained, creating a procedural problem: which language controls?

We contend that the DEIR's treatment of mitigation for significant impacts is insufficient. When an EIR discloses significant environmental impacts, an EIR must propose and describe mitigation measures to be taken to minimize the significant environmental effects identified in the EIR. (§ 21002; Guidelines 15126.4, subd. (a)(1); *Browning-Ferris Industries v. City Council* (1986) 181 Cal.App.3d 852, 866.) The CEQA Guidelines define mitigation as (1) avoidance of impacts by "not taking certain action;" (2) minimizing impacts by reducing the degree or magnitude of action; (3) rectifying the impact by "repairing, rehabilitating, or restoring the impacted environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations, and (5) compensating for the impact by replacing or providing substituted resources. (CEQA Guideline § 15370; *Mira Mar Mobile Community v. City of Oceanside, supra*, 119 Cal.App.4th at p. 495.) Moreover, Pub. Resources Code, § 21081.6, subd.(b), requires mitigation measures to be fully enforceable through permit conditions, agreements, or other measures.

#### **Growth Inducing Impacts.**

The DEIR fails to address growth inducing impacts, explaining that traffic generated by the Project would occur anyway. This bare conclusion fails to satisfy the requirement that the EIR serve as an informational document. An EIR must discuss a project's growth-inducing impacts even if it does so briefly (§ 21100, subd. (b)(5); CEQA Guidelines, §§ 15126, subd. (d), and 15126.2, subd. (d).) which states "Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause

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significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

15-20

### Specific Comments Regarding Impact Issues

#### Noise

DEIR insufficient as an informational document. The DEIR excludes existing sensitive receptors (residential dwelling units) along Walerga Road between PFE and Baseline Roads. Several homes in the Doyle Ranch subdivision back up to Walerga Road and will be adversely affected by noise resulting from both increased construction activities and traffic on a six lane thoroughfare operating at LOS D. This omission creates a substantial likelihood that the decision makers and the public will not fully appreciate the fact that the proposed project represented a substantial increase in the amount of permissible development on the phase two site, diverting attention away from the project's true noise impacts. Unless the DEIR is mended to analyze these impacts it could be found deficient as an informational document (See *Kings County Farm Bureau v. City of Hanford, supra*, 221 Cal.App.3d at pp. 717-718 which held that a misleading impact analysis based on erroneous information rendered an EIR insufficient as an informational document.)

15-21

#### Construction related impacts:

- Activities associated with the widening of Walerga Road along the Doyle Ranch frontage could result in structural damage to pools and outdoor improvements within 25 feet of the right of way from construction related vibration (pg. 5-18). This impact was not analyzed in the DEIR and no mitigation is proposed.
- Noise impacts during construction could be significant (pg. 5-18). Mitigation Measure 5-1a (pg 5-18) requires the development and implementation of a noise abatement program, but does not specify which entity is responsible for approving the Construction Noise Abatement Program, how noise impacts will be monitored, who is responsible for monitoring noise impacts, and what will happen if the Construction Noise Abatement Program is violated?

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#### Operational impacts:

The DEIR concludes that noise impacts resulting from the operation of a six lane thoroughfare on Walerga are "Significant and Unavoidable", and therefore no mitigation is required. We strongly object to this conclusion. Because the noise analysis failed to consider impacts to houses in Doyle Ranch and Morgan Creek that abut Walerga Road, only noise impacts along PFE Road appear to have been analyzed. We understand the county's position on the use of noise attenuation walls; however, it is unreasonable to assume that current and future residents on the Walerga Road would be unaffected by increased traffic related noise. Several of the homeowners have made substantial investments in outdoor improvements, the enjoyment of which would be potentially compromised. The DEIR must be amended to consider noise impacts to existing residences on Walerga Road and if necessary, develop appropriate mitigation.

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## Traffic

Walerga Road Bridge. An environmental impact report must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects. The DEIR fails to consistently analyze impacts from the widening of Walerga Road between PFE and Baseline Roads. As noted before, the DEIR omits any discussion related to the new bridge structure that will be required on Walerga Road at Dry Creek. The county certified the Walerga Road Bridge Replacement Mitigated Negative Declaration (SCH# 208102100) that analyzed the impacts of a four lane bridge over Dry Creek on Walerga Road. However, the subject Project description includes widening Walerga Road to six lanes between PFE and Baseline Roads. Not only is the DEIR silent on actions related to the Walerga Road Bridge Replacement Mitigated Negative Declaration, it fails to discuss impacts associated with either 1) adding two additional lanes in the future, or 2) widening Walerga Road to six lanes and building the future bridge with four lanes. Both scenarios are foreseeable and therefore must be discussed.

15-25

Build-out LOS. The preferred alternative will result in a LOS D on Walerga Road at build-out of the general plan (in 2025) and that the Walerga Road/PFE Road intersection will operate at LOS F. It is unacceptable to ask the residents who live along Walerga Road to accept this burden. Doyle Ranch can only be accessed from Walerga Road. How will emergency services be able to respond if they have to battle a gridlocked roadway? The DEIR fails to discuss how traffic impacts will affect emergency response.

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The DEIR failed to properly analyze the following project impacts:

- Safe Route to schools: The DEIR suggests that conflicts between students and construction activities can be mitigated by limiting construction to the summer months. This is impractical and shortsighted. A safe routes plan must be prepared to address this impact.
- Equitable distribution of traffic burden: The DEIR acknowledges that much of the traffic load on Walerga Road is pass-through traffic originating in neighboring jurisdictions. The DEIR should consider a more equitable distribution of the traffic burden throughout the Community Plan area. Ignoring that alternative places an unfair burden on residents along Walerga Road.
- Impact on Sacramento County: The DEIR inadequately addresses impacts to Sacramento County from widening Walerga Road to six lanes north of the Sacramento County line and the impact of the Walerga Road/PFE Road intersection operating at LOS F. We disagree with the DEIR's conclusion that these impacts are less than significant.
- Cut-through traffic: Doyle Ranch streets will be used by frustrated motorists trying to escape Walerga Road. Doyle Ranch can only be accessed from Walerga Road; consequently we will have more speeders and traffic not associated with our community than we do now.

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- Future projects: The DEIR proposes to shift the responsibility for mitigating traffic impacts to future projects. This is reasonable along street frontages where development approvals have not been granted. However, several properties have already been developed or have received their land use approvals. The county cannot impose additional conditions on those properties. Can sufficient funding be raised from traffic impact fees, CIP funding, and future developer contributions to complete the Project described in the DEIR without an infusion from the county general fund? Who will fund the Walerga Road widening in front of Doyle Ranch? Finally, the DEIR fails to include any discussion of how or when traffic mitigation fees would be collected or spent, nor does it identify the extent to which the mitigation measure would alleviate the traffic impacts if some fair share fees were ultimately imposed. Assessment of a traffic impact fee is an appropriate form of mitigation only when it is linked to a reasonable plan for mitigation. (Kostka & Zischke, Practice Under the Cal. Environmental Quality Act, *supra*, § 14.14, p. 700; *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors*.)

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### Biological Resources

In addition to other deficiencies outlined above (mitigation measures outlined in the DEIR are insufficient to ensure that impacts to special status species are fully mitigated) the DEIR is inadequate because it fails to address the possible effect on the movements of animal species within and around the project site. The Initial Study concluded that the project "will not substantially affect established wildlife corridors or impede the movement of wildlife in the area." It does not, however, provide any basis for that conclusion. In fact, the presence of coyotes, opossums, and other wildlife that are part of the healthy ecosystem is well documented by local residents. The Project has the potential to impede the movement of special status fish, mammals, and birds (sandhill crane and great blue heron) protected by California Fish and Game Code and the Migratory Bird Treaty Act of 1918.

15-34

Removal of native trees: The DEIR under estimates the number of native trees that will need to be removed to carry out the proposed project. Impacts to native trees within the Walerga Road right of way, and in the path of the new six lane bridge on Dry Creek, have not been adequately analyzed. Sufficient information exists that would allow for a quantifiable assessment of these impacts to be conducted prior to adoption of the Final EIR.

15-35

Impacts to special status fish in Dry Creek: Because the DEIR failed to develop an accurate project description in omitting the new Walerga Road bridge for the project description, impacts to federally and state listed fish species have not been adequately analyzed. The DEIR wrongly concludes that it is sufficient to require contractors to stay 100 feet away from the Dry Creek channel to mitigate Project impacts. The DEIR did not incorporate the prior analysis of impacts associated with construction of the new four lane bridge on Walerga Road at Dry Creek, and failed to consider the bridge expansion. Construction and modification of the bridge will have significant short term and long term effects on special status fish.

15-36

Loss of Swainson's hawk foraging habitat: The DEIR fails to identify the loss of Swainson's hawk foraging habitat as a project impact. The DEIR must be revised to include mitigation for the loss of Swainson's hawk foraging habitat at a 1:1 ratio in compliance with the developing Placer County HCP/NCCP and California Department of Fish and Game policies.

15-37



Impacts to nesting raptors: Several nesting raptors, including owls, Cooper's hawk, Swainson's hawk, white tailed kite, and red tailed hawk are known to nest along the Dry Creek corridor within and adjacent to the Project area. The DEIR failed to properly analyze the long term effect of increased light and glare, and traffic on these raptors (which could include permanent abandonment of historic nest sites) and consequently did not develop appropriate mitigation measures.

15-38

Impacts to other special status species: The DEIR failed to address impact to several special status species that utilize the Dry Creek corridor including great blue heron, sandhill crane, white-tailed kite, Cooper's hawk, and western pond turtle and other species protected by the California Fish and Game Code and the Migratory Bird Treaty Act of 1918.

15-39

#### Cultural Resources

The DEIR concludes that the Project could result in significant impacts to previously documented cultural resources and proposes two mitigation measures. However, the mitigation measures are insufficient to ensure that impacts are adequately mitigated because they allow discretion and are unenforceable. "For each significant effect, the EIR must describe and discuss feasible mitigation measures that could minimize the effect." (Pub. Resources Code, § 21100, subd. (b)(3); Guidelines, § 15126.4, subd. (a).)

Guidelines Section 15126.4, subdivision (b)(3) states that preservation in place is the preferred manner to mitigate impacts on historic archaeological resources and that an EIR must discuss preservation in place. "The EIR should discuss both measures proposed by the project proponent and measures proposed by the lead agency or other persons that, if required as conditions of approving the project, could reduce the adverse impacts". (Guidelines, § 15126.4, subd. (a)(1)(A).) Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. If the lead agency rejects project alternatives because they are infeasible, the EIR should identify the rejected alternatives and briefly explain why they are infeasible. (*Id.*, § 15126.6, subd. (c); *Laurel Heights I, supra*, 47 Cal.3d at pp. 404'405; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 737 (*San Joaquin Raptor*).)

15-40

#### Aesthetics and Community Character

The DEIR failed to properly consider the effect of the Project on existing communities. The environmental checklist form provided in Appendix G to the Guidelines asks if the project would "physically divide an established community." (Guidelines, Appendix G, subd. IX(a).) The Initial Study concluded that there will be no such impact, but failed to fully explain why. We contend that the Doyle Ranch and Morgan Creek subdivisions constitute a community within the meaning of the Guidelines, as evidenced by the fact that residents from each subdivision currently walk and bicycle along paths and open space corridors that connect the two communities, and that the two subdivisions have had numerous meetings to discuss common concerns related to the DEIR. This community response to the project shows that the residents consider themselves to be an established community. (See *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928: the observations of residents on a nontechnical topic such as this can constitute substantial evidence.)

15-41

In *Cathay Mortuary, Inc. v. San Francisco Planning Com.* (1989) 207 Cal.App.3d 275, the court held that similar language in former subdivision (u) of Guidelines Appendix G was intended to apply to projects, such as highway construction, that would constitute physical barriers dividing a community. Build out of Walerga Road to six lanes absent the guarantee of sidewalks and appropriate traffic mitigation will create a physical barrier separating one part of the local community from the other. Widening Walerga Road to six lanes between Doyle Ranch and Morgan Creek, absent adequate mitigation, has the potential to sever the connection between the two communities.

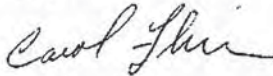
15-41

An aesthetic impact which is environmentally significant may require an EIR. (See *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 588-593 and cases discussed therein). The DEIR inaccurately states that there is little or no landscaping within the Project area that would be affected by the actions to be undertaken. In fact, significant landscaping has been installed and is maturing within the Walerga Road right of way. This landscaping and the mature stand of oak trees in front of Doyle Ranch define the character of the Doyle Ranch and Morgan Creek communities. Removal of this landscaping, during construction and/or pursuant to revisions to Policy 9 of the Traffic Element, will irretrievably alter the character of the area. A fair argument can be made that removing the existing landscaping between Doyle Ranch and Morgan Creek and constructing sound walls to mitigate noise impacts is a potential aesthetic impact on the environment within the meaning of CEQA and therefore must be adequately addressed in the DEIR.

15-42

In conclusion, the DROA respectfully submits these comments and looks forward to receiving notice of the revised and recirculated DEIR.

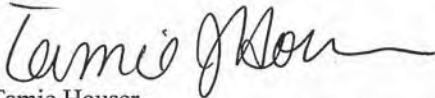
Respectfully,



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## DOYLE RANCH OWNERS ASSOCIATION

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July 23, 2010

Maywan Krach  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, California 95603

Regarding: Follow up Letter of Comment— Dry Creek/West Placer Community Plan  
Transportation Element Update Draft Programmatic Environmental Impact Report  
(SCH # 2007122051)

Dear Maywan:

The Doyle Ranch Owners Association ("DROA") submits the following additional comments on the Draft Environmental Impact Report ("DEIR") referenced above.

### **Discussion of alternatives inadequate.**

The DEIR fails to discuss a proposed alternative that would redesign the existing transportation network to avoid impacts that have been found to Significant and Unavoidable. The DEIR states that alternatives to the proposed Project were considered but rejected (pg. 7-2) but fails to describe those alternatives and why they were rejected. We contend that other alternatives exist that would mitigate impacts to acceptable levels, including extending Don Julio Boulevard and amending the Placer County General Plan Transportation Element to require additional north south linkages to alleviate congestion in the Community Plan area.

**Flawed Public Notice.**

The Notice of Availability contained the wrong address for the July 22, 2010 Planning Commission public hearing. While the county is not required to hold a public hearing to accept comments on the DEIR, once it did it had a responsibility to ensure that the meeting notice was correct. This error was brought to county staff's attention on several occasions (most recently at the July West Placer MAC meeting) but our concerns were dismissed. County staff stated more than once that the error didn't matter because there was only one building on the street (see attached email). Unfortunately, the error may have frustrated the public's participation in the process; at least one Doyle Ranch resident was unable to locate the meeting due to the error. The county has a duty to provide another opportunity for the public to comment on this DEIR.

15-44

Respectfully,



Carol Flinn  
President  
Doyle Ranch Owners Association

## RESPONSE TO COMMENT LETTER 15

**Response 15-1:** Please see Response to Comment 5-1.

**Response 15-2:** See Master Responses 2 and 6. The widening of Walerga Road to six lanes should help to alleviate cut-through traffic through the Doyle Ranch subdivision. If left at four lanes, the potential for cut-through traffic would be higher.

**Response 15-3:** As described in Responses to Comments 15-5 through 15-44 below, no significant new information is provided in this Final EIR. Therefore, recirculation of the Draft EIR is not required.

**Response 15-4:** The commenters' opposition to the proposed amendments in Policies 6 and 9 in the *Community Plan – Transportation Element* update is noted.

**Response 15-5:** The commenters are referred to preceding sentences in the paragraph from which they quoted, "All ground disturbance would be within 100 feet of the existing centerline of Watt Avenue, Walerga Road, and PFE Road." The first sentence of this paragraph, on page 3-16 of the Draft EIR, states that the "Widening of these three roadways...assumes a narrow corridor for impact analysis purposes, and would be designed to minimize the temporary and permanent impact area." The paragraph goes on to describe "approximate" shoulder areas, "approximate" disturbance areas, and "assumed" construction right-of-way dimensions precisely because these improvements have not been designed. Similarly, in the discussion of construction of speed-reduction treatments on page 3-15 of the Draft EIR, it is noted that, "Speed-reduction treatments could take many forms....In this Focused Draft EIR, roundabouts were assumed for impact analysis purposes because roundabouts have the largest temporary and permanent impact area of all speed-reduction treatments." Also, please see footnote 1 on page 3-15 of the Draft EIR, which acknowledges that decisions on speed-reduction treatments will be made once construction-related specifics of the proposed project are determined regarding funding, design, phasing, and implementation. The Draft EIR does not analyze project-level actions, rather it identifies likely assumptions for purposes of impact analyses while clearly stating that design will take place at a later time, which would be subject to a Subsequent Conformity Review Process that would determine, among other things, whether additional environmental review is required, and if so, the scope of such additional review (see Subsequent Conformity Review Process, page 1-3 in the Draft EIR)

**Response 15-6:** The "established criteria" to allow a reduction in LOS Standards are set forth in the bulleted items within the *Community Plan – Transportation Element* update, Policy 9. Streetscape elements such as sidewalks, trails, landscaping setbacks, or medians are not considered when providing a specific LOS for a roadway. LOS is dictated by delay at an intersection or the roadways ability to carry traffic volume. The West Placer MAC will be included in all decisions pertaining to projects that affect the *Community Plan* area.

**Response 15-7:** Please see Response to Comment 15-5.

**Response 15-8:** The County disagrees with the assessment that this is a project/construction-level Draft EIR, for the reasons described in Response to Comment 15-5. Additionally, the impacts for several of the proposed road widening projects have already been considered in project level EIRs for approved projects such as Placer Vineyards, Riolo Vineyards, Regional University, and Sierra Vista specific plans. For those improvements not fully analyzed within one of the approved projects, the County will address evaluate impacts to the environment in more detail than provided in this Draft EIR when each project goes through the CEQA process and such information is available.

**Response 15-9:** Both the NOP/IS and Draft EIR analyzed the proposed project at a program level because project-specific details regarding the construction of speed-reduction treatments along PFE Road and Cook-Riolo Road, the widening of selected *Community Plan* area roadways (Watt Avenue, Walerga Road, and PFE Road), and the removal of the Baseline Road/Cook-Riolo Road/Woodcreek Oaks Boulevard intersection restriction have yet to be developed. The proposed project is limited to enhancing the existing roadway system in the *Community Plan* area. As explained in **Section 3.5.2**, which starts on page 3-14 in the Draft EIR, the majority of permanent ground disturbance associated with the proposed project would occur in previously disturbed areas, with the temporarily disturbed areas returned to pre-project conditions after construction is complete. No new roadways are proposed. Because no new roadways are proposed and the scale of impact is immediately adjacent to existing roadways, land use, aesthetic, flood, and other impacts associated with the proposed project would be similar to those described in the NOP/IS, as described in the second paragraph of page 1-2 of the Draft EIR. Air quality, transportation/circulation, and noise impacts (and other impact) were evaluated in detail for the proposed project in the Draft EIR. See **Chapters 4, 5, and 6** for a description of the anticipated impacts and mitigation measures associated with the proposed project.

**Response 15-10:** The commenters suggest the Draft EIR describes an inaccurate baseline that has the potential to mask the significance of impacts. Placer County disagrees with this suggestion. **Sections 3.1, 3.2, and 3.3** of the December 2007 NOP/IS describe the project location, site characteristics, and surrounding land uses associated with the proposed project. This description was deemed sufficient by Placer County as a description of the physical setting existing at the time of project commencement for an NOP/IS document. The Draft EIR expanded the description of the project location and project study area characteristics (i.e., site characteristics and surrounding land uses) from that stated in the NOP/IS. See **Section 3.1** on page 3-1 of the Draft EIR and **Section 3.3** on page 3-3 of the Draft EIR. As stated on page 1-1 of the Draft EIR, “The Initial Study and NOP prepared for the proposed project determined that Air Quality, Noise, and Transportation and Circulation may have impacts that would be potentially significant and unavoidable, and that these resource areas should be carried forward to the Focused Draft EIR for analysis.” Since Air Quality, Noise, and Transportation and Circulation were the only environmental topics carried forward in the Draft EIR, detailed environmental setting text was created only for these three topics.

Please see Master Response 3 regarding the Walerga Road Bridge Replacement Project, which was not analyzed within the Draft EIR.

The commenters suggest that the Draft EIR “relies on stale traffic counts.” Since the NOP/IS was released in December 2007, this marks the date of existing conditions that were analyzed in the Draft EIR as required by CEQA. As stated on page 6-1 of the Draft EIR, “The traffic associated with full development of the proposed project was estimated under existing (2007) and cumulative (2025) conditions. Daily roadway and PM peak-hour intersection volumes were collected during 2005 and 2006.” The traffic data in used in the Draft EIR was the best available at the time the NOP/IS was released.

The commenters suggest the Draft EIR “omits existing homes along Walerga Road from the list of sensitive residential receptors for both air quality and noise impact assessment.” Only those sensitive receptors within 50 feet of a *Community Plan* area roadway were listed in the Draft EIR, as they were the closest receptors to a *Community Plan* area roadway. Due to the existing setbacks of the residential dwellings along Walerga Road, sensitive receptors lie greater than 50 feet from a *Community Plan* area roadway. **Chapter 4 (Air Quality)** and **Chapter 5 (Noise)** in the Draft EIR provide a detailed account of the environmental setting and impact analysis of all sensitive receptors in the *Community Plan* area likely to be affected by the proposed project.



The commenters suggest the Draft EIR “dismissively refers to the edges of the existing roadways as weedy patches even though they support urban landscaping and native vegetation.” Placer County disagrees with this statement. While roadway landscaping does exist within the *Community Plan* area, it is certainly not predominant along all roadways. Ornamental landscaping exists only at a few locations within the *Community Plan* area, primarily at the subdivision entrances. As stated on page 3-10 of the Draft EIR, “The project site(s) consist primarily of disturbed road shoulders dominated by weedy plant species. In areas off the immediate roadway shoulder but within the area of proposed disturbance, vegetation consists primarily of ornamental plants, as well as low-growing annual grasses and weeds associated with a few heavily grazed horse pastures and plowed fields.”

**Response 15-11:** Please see Master Response 3.

**Response 15-12:** The commenters state the Draft EIR “fails to accurately describe the purpose of the Project.” Placer County staff disagrees with this statement. As stated on page 3-11 of the Draft EIR, “The objective of the *Community Plan – Transportation Element* update is to improve traffic circulation within the *Community Plan* area while at the same time preserving its rural character.” Additionally, **Section 3.4** on page 3-11 of the Draft EIR describes in detail the project objectives (i.e., purpose of the project) of the *Community Plan – Transportation Element* update and **Section 3.5** on page 3-11 of the Draft EIR includes the project description.

The commenters go on to ask, “What purpose then, does the proposed *Community Plan* amendment related to Walerga Road serve?” The purpose, goals, and policies of the *Community Plan* are not being amended to specifically address widening Walerga Road. See **Section 3.5.1** of the Draft EIR, which begins on page 3-12. Page 3-12 of the Draft EIR also states, “Since the *Dry Creek/West Placer Community Plan* was adopted in 1990, many land use changes have occurred in the *Community Plan* area, resulting in the need to update the *Community Plan – Transportation Element* to account for the effects of the proposed and approved developments and the associated traffic that is generated by them.” Please also see Master Response 2, which describes the traffic increases in the *Community Plan* area.

**Response 15-13:** The Draft EIR analyzes all aspects of the proposed project at a level appropriate for a program EIR. A program EIR has been prepared because this is the appropriate level of analysis for a plan, and because project-specific details will be determined once the plan is approved and funding is available for development of specific plan components.

Subsequent to preparation of the NOP/IS, three new elements were added to the proposed project and were separately evaluated as a part of the Draft EIR. The three new elements included widening of selected *Community Plan* area roadways (i.e., Watt Avenue, Walerga Road, and PFE Road) as described in **Section 2.2.2** on page 2-5 in the Draft EIR. As explained in **Section 3.5.2**, which starts on page 3-14 in the Draft EIR, all ground disturbance associated with the proposed project would primarily occur in previously disturbed areas, with the temporarily disturbed areas returned to pre-project conditions after construction is complete. No new roadways are proposed. Because no new roadways are proposed and the scale of impact is immediately adjacent to existing roadways, biological impacts associated with the proposed project would be similar to those described in the NOP/IS. Please also see pages 2-8 through 2-16 of the Draft EIR, which describe additional studies undertaken to assess whether additional ground-disturbing activities would affect biological or cultural resources, which confirmed the assessment in the NOP/IS, and Master Response 2.

**Response 15-14:** The commenters seem to be confusing the significance determination made for hydrology/water quality with that made for the biological resources regarding the proposed project. The proposed project would not involve construction of the proposed Walerga Road Bridge. For the proposed project, less-than-significant impacts are anticipated to occur regarding a direct degradation of water

quality. However, since the proposed project could involve indirect impacts to special-status fish species through construction-related water runoff into Dry Creek, Mitigation Measure B-N is required to reduce a potentially significant impact to a less-than-significant level. Mitigation Measure B-N is described on page 2-14 of the Draft EIR.

**Response 15-15:** As stated on page 50 of the NOP/IS, “The proposed project alone would not induce or accelerate growth (and associated cumulative impacts) in the project vicinity; many other events must occur for substantial population growth to occur. The temporary and permanent impacts of the proposed project are limited in nature and the proposed project is not anticipated to contribute to cumulatively considerable impacts, except potentially in the areas of transportation/traffic, noise, and air quality, where the potential exists for cumulatively considerable impacts.”

Since transportation/traffic, noise, and air quality were identified as potentially resulting in cumulatively considerable impacts, they were analyzed in detail in the Draft EIR. **Section 7.2.2**, which starts on page 7-99 in the Draft EIR, defines the cumulative impact scenario that was analyzed. The cumulative impact scenario includes a description of the land use assumptions and roadway assumptions that were analyzed. The air quality related cumulative impacts are shown on page 7-108 in the Draft EIR, with the following determination: “...the proposed project’s contribution to cumulative impacts on air quality, including greenhouse gas emissions, is not considered cumulatively considerable. Therefore, the proposed project’s cumulative impact on air quality would be less-than-significant.”

**Response 15-16:** Please see Master Response 3.

**Response 15-17:** Placer County staff disagrees with the commenters’ suggestion that, “Most of the recommended mitigation measures are inadequate...” The mitigation developed for the Draft EIR is appropriate for a program level analysis because project-specific details regarding the proposed project have yet to be developed. Once detailed design for the proposed project is developed, additional mitigation can be developed if necessary through the Subsequent Conformity Review Process as described above in Response to Comment 15-5.

The commenters specifically suggest that, “...impacts to biological resources relies on future reports that may be undertaken and compliance with recommendations that may be made in the report to mitigate impacts.” Because this is an update to a plan, analyzed on a programmatic basis, project-specific details regarding the individual components of the proposed project have yet to be developed. While effective mitigation for impacts to biological resources is identified on pages 2-9 through 2-14 in the Draft EIR, it is not feasible to define a mitigation strategy for an exact site in a plan.

**Response 15-18:** **Table 2-2**, which starts on page 2-24 in the Draft EIR, presents a summary of the impacts and mitigation associated with the proposed project. It is meant to truncate the detail for presentation purposes. **Table 2-2** was created from specific text in **Sections 2.4, 4.3, 4.4, 5.3, 5.4, 6.3, and 6.4**. The commenters did not provide any specifics where the impacts and mitigation differ in **Table 2-2** versus **Sections 2.4, 4.3, 4.4, 5.3, 5.4, 6.3, and 6.4**. Therefore, this comment is noted but no response is possible.

**Response 15-19:** Please see Response to Comment 15-17.

**Response 15-20:** **Section 7.3**, which begins on page 7-114 in the Draft EIR, analyzes the growth-inducing impacts of the proposed project. As stated on page 7-115, “Under the proposed project, the population and housing in the *Community Plan* area would remain as currently exists or is planned, as no new buildings or residents are associated with the proposed project. The proposed project would not generate new traffic, but would redistribute traffic throughout the *Community Plan* area with the potential

to increase local congestion on some roadways and intersections.” The proposed project does not propose new development. Therefore, no new vehicle trips would be generated by the proposed project.

**Response 15-21:** Please see Master Response 7.

**Response 15-22:** Please see Master Response 7.

**Response 15-23:** Please see Master Response 7.

**Response 15-24:** Please see Master Response 7.

**Response 15-25:** Please see Master Response 3.

**Response 15-26:** All of the residents within the *Community Plan* area will be affected by the LOS along Walerga Road and at the intersection of Walerga Road/PFE Road due to cumulative traffic impacts. The LOS along Cook-Riolo Road will be E and F, depending on the segment, at build out. The County analyzed five different roadway network alternatives in an effort to determine which network created the fewest physical impacts and resulted in the best LOS for the entire roadway network. **Chapter 7** of the Draft EIR includes detailed descriptions of the various roadway networks, the resulting impacts, and LOS. Please also see Master Response 6.

**Response 15-27:** As stated on page 27 of the NOP/IS, “Construction of the proposed project would require sporadic lane closures for a limited time...Adherence to industry standard BMPs, such as implementation of a traffic control plan and the use of flag persons, would result in a less-than-significant impact.”

Page 27 of the NOP/IS goes on to state: “Implementation of the proposed project would not interfere with any emergency response plan or emergency evacuation plan, since PFE Road would remain open to vehicular traffic. However, the speed reduction treatments would reduce travel speeds from approximately 40 to 30 miles per hour (mph) on the affected roadways. The reduction in travel speeds would slightly increase emergency response times because emergency vehicles would have to navigate the proposed speed reduction treatments, which would require a slower speed. However, the slight increase is considered less than significant by the Placer County Sheriff’s Department, the California Department of Forestry/Placer County Fire Hazard Mitigation Program, and the California Highway Patrol (Walton, 2007; Dimaggio, 2007).”

Additionally, the widening of Walerga Road, Watt Avenue, and PFE Road under the proposed project would facilitate emergency access within the Community Plan area in the future due to the additional roadway capacity.

**Response 15-28:** Placer County regularly participates in the Federal Highway Administration’s (FHWA) “Safe Routes to School” program. The concept is to increase the number of children who walk or bicycle to school by funding projects that remove the barriers that currently prevent them from doing so. Those barriers include lack of infrastructure, unsafe infrastructure, lack of programs that promote walking and bicycling through education/encouragement programs aimed at children, parents, and the community. Placer County was awarded federal funding in 2009 in order to design improvements for the Sheridan Elementary School, which is lacking in basic safety improvements. The Safe Routes to School program is an extremely competitive program, as Placer County competes with all other local government agencies in California to receive federal funding.

Placer County also regularly works with school districts to improve safety at school sites. It is the County's desire to provide safe access for students. Placer County typically relies on developers to construct the necessary frontage improvements that include sidewalks and bike lanes such as on Walerga Road with the Morgan Creek and Doyle Ranch subdivisions, or Cook-Riolo Road with the Morgan Greens Subdivision.

In 2008 Placer County worked with the Weimar Middle School in order to provide safer ingress and egress not only for students, but for parents picking up their students.

If construction during off-summer months is to occur when the speed-reduction treatments are constructed, a construction management plan will be created in order to identify reasonable mitigations for both student and parental routes to school. Since Placer County is not proposing the construction of speed-reduction treatments at this time, it would be premature to prepare the plan now.

**Response 15-29:** Please see Master Response 6 and Response to Comment 5-6.

**Response 15-30:** Please see Master Response 5.

**Response 15-31:** The commenters suggest that Doyle Ranch subdivision streets will be used by traffic escaping Walerga Road (i.e., to cut through to other roadways). Placer County staff disagrees with this suggestion. Doyle Ranch Drive and Farrier Way do not connect with any *Community Plan* area roadways except Walerga Road at this point in time. The commenters provide no specifics to substantiate a claim of cut through traffic. Therefore, this comment is noted but no response is possible.

**Response 15-32:** In 1996, Placer County implemented the Countywide Traffic Impact Fee Program and split the County into districts based on community plans or geographic areas. At that time the existing Dry Creek Fee Program was incorporated into the Countywide program. After the adoption of this *Community Plan – Transportation Element* update, the Capital Improvement Program and district fee will be modified to reflect the current roadway projects, including the need to widen Walerga Road from Baseline Road to the Sacramento County line. Traffic impact fees are paid at the time of issuance of building permits, so even if a project has received environmental and land use approvals (e.g., Placer Vineyards, Regional University, Riolo Vineyards, Silver Creek), they would pay the traffic impact fee in effect when the building permits are issued. In addition, the County has been able to negotiate an agreement with the City of Roseville such that projects developing within the City pay their fair share for impacts to Placer County roads.

The *Community Plan* looks at road improvements necessary over an extended period of time, approximately 20 years in this instance, so that there is sufficient time to collect impact fees before the roadway improvements are needed. The Dry Creek Fee Program was designed, and continues to operate without supplemental funding from the County General Fund.

The commenters go on to ask, "Can sufficient funding be raised from traffic impact fees, CIP funding, and future developer contributions to complete the Project described in the Draft EIR without an infusion from the county general fund? Who will fund the Walerga Road widening in front of Doyle Ranch?" Since the proposed project is not anticipated to be constructed until approximately 20 to 25 years from now, and because the need for improvements is dependent upon approved new development being constructed, sufficient time is available to collect the necessary traffic impact fees to construct the proposed project without a cash infusion from the County general fund.

**Response 15-33:** Please see Response to Comment 10-5.

**Response 15-34:** Please see Response to Comment 2-1.

**Response 15-35:** Please see Master Response 2. Placer County staff disagrees with the commenters' statement that "Sufficient information exists that would allow for a quantifiable assessment of these impacts to be conducted prior to adoption of the Final EIR."

**Response 15-36:** Please see Master Response 3, which described the process by which the Walerga Bridge Widening Project was fully analyzed in an IS/MND.

The commenters state that "The Draft EIR wrongly concludes that it is sufficient to require contractors to stay 100 feet away from the Dry Creek Channel to mitigate Project impacts." Placer County staff disagrees with this statement. As stated on page 3 of the Initial Study supporting the MND, the existing Walerga Road Bridge is 126 feet long and the proposed Walerga Road Bridge will be 529 feet long, a difference of 403 feet. Because of the length of the proposed Walerga Road Bridge, construction activities associated with the proposed project will be more than 100 feet from the Dry Creek Channel.

Pages 15 through 24 of the Initial Study supporting the MND analyzed the biological resource impacts of the proposed Walerga Road Bridge. Pages 16 through 22 of the Initial Study supporting the MND analyze the special-status species impacts of the proposed Walerga Road Bridge, while pages 23 and 24 outlined the proposed mitigation to reduce potentially significant impacts to a less-than-significant level.

**Response 15-37:** Mitigation Measure B-C on pages 2-9 and 3-10 in the Draft EIR prescribes pre-construction nesting raptor surveys as a part of the proposed project. This mitigation measure specifically addresses Swainson's hawk impacts.

**Response 15-38:** The NOP/IS evaluated the light and glare impacts of the proposed project. As stated on page 6 of the NOP/IS, "Construction of the proposed project would not create a substantial source of light or glare. The study area is currently illuminated with standard street lighting. Additional lighting would be installed as part of the design of the speed reduction treatments, and would comply with county standards regarding lighting." Lighting would also be installed according to county standards in conjunction with the widening of the selected Community Plan area roadways (i.e., Watt Avenue, Walerga Road, and PFE Road). As stated on page 6 of the NOP/IS, "Many other visual/aesthetic elements of the community adjacent to the roadways serve as buffers that would limit the direct line of sight views of the new lighting. The proposed project would result in a slight increase in overall light intensity in the vicinity of the project site(s). The impact on surrounding properties would be considered be less than significant." Because no new roadways are proposed and the scale of impact is located immediately adjacent to existing roadways, light and glare impacts on nesting raptors associated with the proposed project would be similar to those described in the NOP/IS.

**Response 15-39:** The list of special-status species that were reviewed were based on the follow sources as stated on page 12 of the NOP/IS and page 2 of the **Appendix C** memorandum in the Draft EIR: the California Department of Fish and Game (CDFG), California Natural Diversity Database (CDFG, 2007; CDFG, 2008) for the Citrus Heights and surrounding eight 7.5-minute U.S. Geological Survey quadrangles; and the U.S. Fish and Wildlife Service (USFWS) species lists for the quadrangles listed above (USFWS, 2007). The commenters suggest the Draft EIR failed to address impacts to several special-status species, including "the great blue heron, sandhill crane, white-tailed kite, Coopers' hawk, western pond turtle, and other species..." Impacts to the western pond turtle and other species are discussed on pages 13 and 14 of the NOP/IS and pages 2 through 4 in the **Appendix C** memorandum in the Draft EIR. Impacts to the great blue heron, sandhill crane, white-tailed kite, Coopers' hawk were not specifically evaluated because they were not determined to be present in the study area, according to the CDFG and the USFWS databases.

Please also see Response to Comment 2-1 for additional information regarding biological resources.

**Response 15-40:** Mitigation measures C-E and C-F identified on pages 2-15 and 2-16 in the Draft EIR are appropriate for a program level analysis, for the reasons described in Response to Comment 15-17. It is not known at this time if the previously documented cultural resources would be impacted by the proposed project. The cultural resources mitigation measures on pages 2-14 through 2-16 in the Draft EIR have been designed to mitigate for impacts that could potentially occur.

**Response 15-41:** Walerga Road was constructed and has been in operation for several decades prior to the construction of the Doyle Ranch or Morgan Creek subdivisions. As stated on page 164 of the 1990 *Community Plan*, Walerga Road was identified as a six-lane roadway (see Table T-3). The proposed project is limited to enhancing the existing roadway system in the *Community Plan* area. The existing roadway system is located between the urbanized areas of northern Sacramento County and the City of Roseville. Since no new roadways are proposed, and no homes would need to be removed to accommodate the proposed project, Placer County disagrees with the commenters' statement that the proposed project would "physically divide an established community." Placer County recognizes that residents from each subdivision may walk/bicycle to the other, and discuss common issues affecting the two subdivisions. However, these facts alone do not make the two subdivisions one entity. Since Walerga Road existed long before either subdivision was built, it is not possible to divide the Doyle Ranch or Morgan Creek subdivisions, because they are already divided. It is Placer County's intent for residents within both subdivisions to have accessibility to each other. Placer County does not intend to remove walkways or bikeways between the subdivisions.

**Response 15-42:** Please see Master Response 2.

**Response 15-43:** The Whisper Creek Subdivision, which dealt with the extension of Don Julio Boulevard, included a traffic study that showed that the extension of Don Julio Boulevard provided no real LOS benefit to Walerga Road or Foothill Boulevard. Placer County anticipated that the same would hold true for North Antelope Road. North Antelope Road would relieve some traffic burden on Cook-Riolo Road, but not Walerga Road or Foothills Boulevard. North Antelope Road, if extended, would have the added burden of constructing a bridge over Dry Creek. Also, the signalization of the North Antelope Road and PFE Road intersection would mitigate the impact due to the elimination of the Don Julio Boulevard extension to PFE Road (refer to State Clearing House # 2004062132 – Whisper Creek EIR).

**Response 15-44:** Please see Response to Comment 5-1.